



**ASIAN INFRASTRUCTURE
INVESTMENT BANK**

Results-backed Financings

**Environmental and Social Systems Assessment
P001015 Türkiye: Water Efficiency and Climate Resilience for Results
(Results-Based Financing)**

Currency Equivalents

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Currency Unit – Turkish Lira (TRY)

USD1.00 = TRY42.94

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Abbreviations

AF	Associated Facilities
AFAD	Disaster and Emergency Management Authority
CHS	Community Health and Safety
CIMER	Presidency Communication Centre
DLI	Disbursement-linked Indicator
DLR	Disbursement-linked Result
DSI	General Directorate of State Hydraulic Works
EIA	Environmental Impact Assessment
ES	Environmental and Social
ESEL	Environmental and Social Exclusion List
ESF	Environmental and Social Framework
ESP	Environmental and Social Policy
ESSA	Environmental and Social System Assessment
GRM	Grievance Redress Mechanism
I-ESMS	Institutional Environmental and Social Management System
ICOLD	International Commission on Large Dams
ILO	International Labor Organization
IPM	Integrated Pest Management
LC	Land Consolidation
LRP	Livelihood Restoration Plan
MDBs	Multilateral Development Banks
MoAF	Ministry of Agriculture and Forestry
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoLSS	Ministry of Labor and Social Security
NOCs	Non-Objection Certificates
OHS	Occupational Health and Safety
OSGBs	Accredited Occupational Safety and Health Service Providers
PMU	Project Management Unit
PO	Project Objective
PPM	Project-affected People's Mechanism

RBF	Results-based Financing
RBP	Results-based Project
RBP AP	RBP Action Plan
RF	Results Framework
SCADA	Supervisory Control and Data Acquisition
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harrassment
WUA	Water User Association
YIMER	Foreigners Communication Center

Table of Contents

Executive Summary	1
1. Overview	12
1.1. Background	12
1.2. Objectives of the Environment and Social Systems Assessment (ESSA)	12
1.3. ESSA Process	13
2. RBP Description	14
2.1. An Overview of Government Program	14
2.2. Defining RBP Scope	15
2.3. Geographic Coverage of the RBP	20
2.4. Key Implementing Agency	20
2.5. Screening and Exclusion of High ES Risk Activities	22
2.6. Identifying the Expected ES Effects of the RBP	25
3. Assessment of Borrower’s ES Management Systems	36
3.1. Policy and Legal Framework for Managing the ES Effects of the RBP	36
3.2. Assessment of Institutional Capacity for Addressing ES Effects	53
4. Stakeholder Engagement and Grievance Redress	62
4.1. Stakeholder Engagement during ESSA preparation	62
4.2. ESSA Disclosure and Consultation	62
4.3. Grievance Redress Mechanism	63
5. Recommendations and Actions	66
5.1. Conclusions of ESSA	66
5.2. ES Actions in the RBP AP	66
5.3. RBP Implementation Support and Monitoring	71
Annex 1. Indicative matrix to define RBP and screen ES effects	72
Annex 2: Indicative list of ES regulations	74
Annex 3: Summary of Public Consultation Events and Stakeholder Engagement during the ESSA	104
Annex 4: Indicative checklists for assessing the ES management systems against core principles and core elements	111

Executive Summary

Overview and the Results-based Project

1. Türkiye faces increasing pressures on its water resources due to climate variability, rising demand for water in different sectors, particularly for food production, and growing flood risks that threaten communities and infrastructure. In response, the Government of Türkiye, under the Twelfth Development Plan (2024–2028) and the General Directorate of State Hydraulic Works (DSI), in its Strategic Plan covering the same period, for the same period, set strategic investment plans and target indicators for improving water resources management and addressing climate-change-induced flood risks. The proposed Results-Based Project (RBP) supports the DSI Strategic Plan in its attempts to modernize irrigation through pressurized, energy-efficient, and automated systems and to strengthen flood risk management through structural measures and basin-level planning tools. By prioritizing high-impact and flood-prone areas, the RBP aims to improve water-use efficiency, reduce losses, enhance climate resilience, protect livelihoods, and reinforce institutional capacity for sustainable water management.

2. **RBP Development Objectives (PO).** The program aims to enhance water conveyance efficiency and climate resilience in Türkiye’s water-scarce and flood-prone regions by promoting modern, pressure-regulated irrigation systems and strengthening flood control capacity. The RBP development objectives are focused on improving water conveyance efficiency, reducing losses, and strengthening protection against climate-induced flood risks to improve land and water management and enhance the climate resilience of infrastructure, land and people in the target areas.

3. **Program Activities.** Under the broader government program, the investments prioritize modern, efficient, and sustainable water infrastructure. Program activities emphasize (a) the expansion and modernization of pressurized irrigation systems to improve water productivity and resilience, and (b) the development of climate-resilient flood control and management facilities to reduce risks to populations, settlements, and agricultural lands. These activities are complementary to the ongoing efforts in basin-level planning, national flood and drought forecasting, early warning systems, and an enabling legal and institutional framework. Within this framework the RBP supported by the Asian Infrastructure Investment Bank (AIIB) finances a defined subset of priority investments. The program excludes dams, reservoirs, ponds, and all environmental and social (ES) high-risk activities¹ and concentrates on (a) efficient, climate-resilient irrigation systems and (b) flood protection and control measures. The total program envelope is USD10.4 billion, of which AIIB provides USD500 million, complementing substantial government financing. Key irrigation activities include the scaling up of modern pressurized irrigation systems across seven priority river basins, covering a gross irrigated area of more than

¹ Activities which the Bank determines are Category A activities following the provisions of its ESF and other activities that are likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or Project-affected people, are not eligible for financing under the RBP, and are excluded from the RBP

44,000 hectares (ha). These investments contribute to expanding climate-resilient and efficient irrigation areas, rehabilitating existing systems, increasing irrigation coverage, and improving overall irrigation efficiency under DSI's operational responsibility. The program is expected to directly benefit an estimated 113,000 people through improved agricultural productivity and water security. Flood management activities focus on reducing flood-related risks and losses through structural interventions such as flood control facilities, river training works, flood traps, reclamation benches, and debris-retention weirs, particularly in upper river basins. These investments are complemented by expanded flood early warning systems and basin-level risk management approaches. The flood component is expected to directly and permanently benefit more than 431,000 people in targeted flood-prone areas, with final beneficiary numbers confirmed at appraisal.

Objectives and Methodology of the Environmental and Social Systems Assessment (ESSA)

4. **Objectives of the ESSA.** An Environmental and Social Systems Assessment (ESSA) was conducted for the proposed RBP. The overall objectives of the ESSA are to: (a) assess the potential ES risks and impacts of the proposed RBP; (b) assess the adequacy of the systems proposed to be applied to the RBP for managing potential ES risks and impacts; (c) assess the institutional capacity of DSI and involved agencies in managing of ES risks and impacts of the RBP; and (d) recommend actions to strengthen specific aspects of the capacity of involved agencies and these systems for mitigating ES risks and impact during the preparation and implementation of the RBP. Outcomes of the assessment would help the RBP avoid, minimize, or mitigate ES adverse impacts; promote ES sustainability in the RBP design; help clients strengthen their ES systems and develop adequate capacity to manage ES risks and impacts; and promote informed decision-making regarding the RBP's ES effects.

5. **Methodology of ESSA.** The Project Team reviewed relevant secondary literature prior to and during the conduct of the ESSA. The key documents included applicable Acts, Rules, policies, Government Orders, Circulars, Gazette notifications, guidelines, reports and studies commissioned as part of program preparation. The Project Team also collected primary data, by holding meetings and discussions with DSI representatives, including regional directorates and Water Association Unions, vendors of Irrigation Automation System, construction contractors, DSI field staff, and beneficiaries (farmers and village leaders). The Project Team conducted field visits to sites in two provinces, Adana and Mersin, to assess the potential ES impacts of the RBP, understand how ES risks and impacts are being assessed and managed for DSI's ongoing irrigation and flood control projects, and conduct consultations with local communities.

6. **Identified Environmental and Social Effects of the RBP.** The ES due diligence exercise carried out during ESSA preparation identified the following ES risks, impacts and benefits. Overall, the proposed RBP is expected to deliver substantial and mutually reinforcing ES benefits by improving water efficiency, climate resilience, and sustainable land and water management. Modernized irrigation and flood control infrastructure will reduce water losses, stabilize water supply, protect soils and ecosystems, improve water quality, and lower energy use and associated

greenhouse gas emissions, while enhancing agricultural productivity and food security. These environmental gains are closely linked to social benefits, including increased incomes, employment generation, strengthened rural livelihoods, improved public health, and reduced disaster-related losses. The RBP will also support more equitable access to water, empower Water User Associations through improved governance and digitalization, promote women's participation and leadership in water management, and enhance community resilience by reducing flood risks and associated displacement. Together, these outcomes contribute to safer living conditions, stronger institutions, and long-term, inclusive, and climate-resilient rural development with the following ES risks identified

- *Environmental risks*. The environmental risks associated with the RBP are assessed as medium, temporary, site-specific, reversible and manageable, and the RBP is expected to deliver overall positive environmental outcomes. During the construction phase, irrigation and flood control sub-projects may result in temporary air, noise, and dust emissions; generation of construction and demolition waste; soil erosion and sedimentation; localized water pollution from runoff; occupational and community health and safety risks; and limited, short-term disturbance to habitats, particularly in riparian areas. These impacts are predictable, largely reversible, and limited in scale and duration. They can be effectively mitigated through standard construction practices, sound water and drainage management, biodiversity avoidance measures, and compliance with national legislation and international good practice. Notably, the RBP eligibility criteria explicitly exclude high-risk activities that would result in significant adverse impacts on critical natural habitats, protected areas or biodiversity areas as defined by national law, or physical cultural heritage. During the operational phase, irrigation projects may pose risks related to increased water abstraction, waterlogging and salinization, agrochemical runoff, localized pressures on biodiversity, and a low likelihood of invasive species introduction. Flood control projects may affect natural flood regimes, sediment transport processes, erosion patterns, downstream distribution of flood risks, and water quality. As a result, RBP-financed investments are not expected to generate significant, cumulative, irreversible, or adverse environmental impacts.
- *Social risks*: The RBP's social risks are assessed as moderate, site-specific, and manageable across irrigation and flood control investments. During the design and preparation phase, key social risks arise from land acquisition and resettlement, as well as from gender and social inclusion constraints, particularly when eligibility for project benefits is tied to land ownership and formal registration with irrigation institutions. In one project (Samsun Mert River) under the flood control component, land acquisition would cause physical displacement, requiring careful management to avoid adverse impacts on the livelihoods of affected households. During the construction stage, temporary community health and safety risks may arise from excavation works, heavy machinery, construction traffic, and short-term disruptions to community spaces. In the operational phase, irrigation projects may face risks related to imbalances in water distribution and continued gender-based barriers to participation in water governance, while flood control structures may affect land use and access along river corridors and pose localized public

health risks if not properly managed. Overall, these social risks can be effectively mitigated and managed through robust planning and standard measures, including inclusive stakeholder engagement, transparent and well-planned land acquisition and compensation - including livelihood support provisions to affected households, labor and community interaction management, community health and safety measures, and equitable water and asset governance.

7. **Program Exclusion.** The following are the criteria for the exclusion of high ES risk activities applied to the RBP:

- (a) All Category A activities following the provisions of AIIB's ESP.
- (b) All Category B activities that are likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or project-affected people.
- (c) Activities/sub-projects that would result in significant adverse impacts on protected areas or biodiversity areas as defined by national law and/or on critical natural habitats.
- (d) Activities that would adversely affect places of cultural significance and/or protected historical/archaeological assets (both natural and human-made).
- (e) Activities that would result in any large physical displacement in government land and private land acquisition (from more than 200 persons), including activities that may involve or result in forced eviction. The RBP shall exclude provision of irrigation services to the land area that has been or is being consolidated where concerns of forced eviction exist.
- (f) Activities/sub-projects involving the construction of any new dam or the rehabilitation of existing dams.
- (g) Activities/sub-projects that have not completed the national EIA process.
- (h) Activities and items listed in the Environmental and Social Exclusion List (ESEL).

8. The assessment confirmed that the activities do not include those that are not eligible for RBP financing. During implementation, DSI is required to ensure that all such activities ineligible for RBP financing remain excluded.

Assessment of Borrower's ES Management System

9. **Policy and Legal Framework for Managing the ES Effects of the RBP.** Türkiye has an adequate and comprehensive policy and legal framework for managing ES risks and impacts under the RBP, supported by provisions that promote access to information, transparency, accountability, and stakeholder participation. From an environmental management perspective, the Environmental Law No. 2872 establishes the overarching framework, while the Regulation on Environmental Impact Assessment (EIA) governs project classification, assessment procedures, and public participation in environmental decision-making. In addition, the Regulation on Environmental Permit and License—particularly for auxiliary construction facilities such as quarries, borrow pits, crushing and screening plants, and concrete batching plants, subject to capacity thresholds—defines environmental permitting requirements, and the Regulation on Environmental Audit strengthens inspection and enforcement mechanisms through the Ministry of Environment, Urbanization and Climate Change (MoEUCC) and its provincial directorates.

Environmental impacts arising during construction and operation are further regulated through secondary legislation, including the Regulations on Water Pollution Control, Soil Pollution Control, Waste Management, Excavation Soil and Construction and Demolition Waste, Waste Oils, Packaging Waste, Waste Batteries and Accumulators, Waste Electrical and Electronic Equipment (WEEE), Vegetable Waste Oils, Medical Waste, and Zero Waste, which together provide detailed technical requirements for applying a waste management plan, waste minimization at source, safe storage, transport, and disposal, and protection of environmental and public health. Air quality and noise impacts are addressed through the Regulation on Assessment and Management of Air Quality, Regulation on Control of Exhaust Gas Emissions, Regulation on Environmental Noise Assessment and Management, and the Regulation on Noise Emissions from Outdoor Equipment, which establish compliance limits and technical standards applicable to construction activities and equipment use. Protection of water resources and water quality objectives is further supported by the Regulation on Surface Water Quality and the Regulation on the Protection of Groundwater against Pollution and Deterioration, which provide the basis for controlling impacts on receiving environments. Environmental risks related to agricultural production are addressed through legislation on Plant Protection Products, Good Agricultural Practices, Organic Agriculture, and Chemical Fertilizers, supporting traceability, environmental protection, and safe agricultural production practices.

10. For social safeguards, the Labor Code No. 4857 establishes core provisions on working conditions, non-discrimination, prohibition of harmful or exploitative forms of labor and working conditions, while the Occupational Health and Safety Law No. 6331 and its extensive secondary regulations (covering OHS services, construction safety, risk assessment, emergency preparedness, personal protective equipment, training, work equipment, noise and vibration, chemicals, dust, safety signage, and work stoppage) provide a comprehensive framework and planning for preventing occupational accidents and diseases during construction and operation. Program integrity, accountability, and ethical conduct are reinforced through the Turkish Criminal Code No. 5237, which establishes deterrent and sanction-based provisions against corruption, coercion, fraud, falsification, and offenses affecting public safety that may arise in connection with BRP activities. Social risks related to land acquisition and land use are governed by the Expropriation Law No. 2942, Land Registry Law No. 2644, Soil Conservation and Land Use Law No. 5403, and the Regulation on Land Consolidation and On-Farm Development Services, which together provide safeguards related to public interest determination, negotiated settlement, land and asset valuation, objection and judicial review mechanisms, the principle of equal value in land consolidation, and transparency in land reallocation processes. Protection of communal rural lands is ensured through the Pasture Law No. 4342, while the Forestry Law No. 6831 provides legal safeguards for forest areas where Program interventions may intersect with forest land. Cultural heritage protection is regulated under Law No. 2863 on the Protection of Cultural and Natural Assets, including permit requirements and chance-find procedures applicable during planning and construction. Transparency, stakeholder engagement, and grievance channels are supported through the Right to Information Law No. 4982 and the Right to Petition Law No. 3071. Social protection and services for vulnerable groups are addressed under the Social Services Law No. 2828. When assessed in conjunction with the RBP's screening and eligibility criteria—which exclude ES high-risk activities, including those involving significant environmental impacts,

large-scale displacement, significant adverse impacts on critical natural habitats, or dam construction—this legal and institutional framework is considered generally adequate and conducive to ensuring that the RBP activities remain moderate-risk, reversible, and manageable through established national systems and standard implementation practices. However, targeted improvement (particularly in operationalizing inclusive engagement of vulnerable groups, strengthening monitoring and reporting practices, and establishing a structured, traceable, and program-level integrated grievance redress mechanism) would further enhance the effectiveness and consistency of RBP implementation.

11. **Assessment of Institutional Capacity for Addressing ES Effects.** DSI has a mature, institutionally embedded, and well-resourced organizational structure for managing environmental, social, and occupational health and safety (ES/OHS) risks under the RBP, reflecting its long-standing role as Türkiye’s primary water resources authority. Rather than relying on a stand-alone project unit, ES/OHS responsibilities are integrated into DSI’s permanent headquarters, regional directorates, and sub-provincial units, ensuring continuity, accountability, and retention of institutional knowledge throughout the RBP lifecycle. Strategic oversight and coordination are provided at the central level. Implementation and day-to-day supervision are carried out by 26 basin-based regional directorates and their local units, enabling effective on-the-ground management of ES risks. Dedicated departments are responsible for land acquisition and compensation, environmental assessment and monitoring, and OHS, supported by substantial staffing at both central and regional levels and complemented by accredited external service providers and environmental consultants as needed. DSI’s extensive experience in implementing internationally financed projects, together with its structured and recurring training programs on expropriation, environmental management, and OHS and its ongoing development of an institutional Environmental and Social Management System (I-ESMS), demonstrates strong institutional capacity to manage ES impacts and progressively align RBP implementation with international good practice.

12. **Operational Performance in Managing ES Effects.** DSI has demonstrated strong operational performance in managing ES effects through its long-standing experience with nationally and internationally financed water infrastructure projects and its consistent application of Türkiye’s environmental, labor, land acquisition, and OHS frameworks. Environmental management practices are well-established, supported by basin-level planning, systematic permitting and compliance processes, and dedicated environmental units at headquarters and regional levels, resulting in positive outcomes such as reduced water losses, improved climate resilience, and integration of ecological considerations into project design. Social performance is generally sound, particularly in land acquisition and resettlement, labor management, occupational safety, and stakeholder engagement, with evidence of effective compensation practices, avoidance of unnecessary expropriation, meaningful consultations with local communities, and gender inclusion and support for vulnerable users. Grievance management is functional through national platforms and project-level mechanisms, though practices remain uneven across regions. Overall, DSI’s operational systems are adequate and effective for the RBP, and ongoing initiatives are expected to further strengthen consistency, documentation, and alignment with international good practice during Program implementation.

Stakeholder Engagement and Grievance Redress Mechanism

13. Stakeholder engagement under the RBP has been actively conducted during ESSA preparation through site visits and consultations with DSI regional units, contractors, WUAs, local authorities, and farmers, ensuring that RBP design reflects on-the-ground realities and stakeholder priorities. DSI currently operates a widely accessible grievance redress system that combines local resolution mechanisms with national platforms such as CIMER and YIMER, enabling most complaints to be addressed efficiently at the community level while preserving clear escalation pathways. Although verbal grievances are commonly resolved promptly at the local level, they are not consistently recorded systematically, which limits the ability to track cases, monitor resolution trends, and draw lessons to improve grievance management across regions. The ESSA therefore recommends strengthening the grievance framework through standardized procedures, centralized data tracking, and basin-level communication arrangements. Together with ongoing information disclosure and targeted engagement of vulnerable groups, these improvements are expected to enhance transparency, accountability, stakeholder confidence throughout RBP implementation and to ensure that – not only affected persons in the RBP areas but also local people and concerned agencies in the seven basins, can lodge their issues, if any (particularly the water use of the RBP activities in the basins) - and their issues are resolved and responded in an effective and timely manner.

Recommendations and Actions

14. The ESSA concludes that the ES risks and impacts of the RBP are categorized as Category B, as the key ES risks and impacts are considered to be generally medium, site-specific, temporary, reversible, and predictable, which can be effectively mitigated with standard construction practices and compliance with national environmental regulations. High-risk activities that are likely to have significant adverse impacts on ES systems, and that are sensitive, diverse, or unprecedented, are excluded from the RBP. The legal and policy framework, including the ES management systems (ESMS) were found to be adequate; however, certain gaps remain, from the perspective of actual implementation of such systems identified through this ESSA. To properly manage the identified risks and impacts of the RBP, ES actions and measures have been developed, discussed and agreed with the stakeholders as below:

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
1.	<ul style="list-style-type: none"> ES responsibilities are distributed among different departments of General Directorate (GD) of DSI. Designated ES focal points are needed to coordinate efforts and ensure that all ES risks and impacts of the RBP are properly managed. 	<ul style="list-style-type: none"> GD of DSI will assign and maintain ES focal points for the RBP (one for environment, one for social and one for OHS) who will coordinate and be responsible to address ES and OHS issues and actions. 	DSI	<ul style="list-style-type: none"> Prior to Loan Effectiveness and throughout the implementation period 	<ul style="list-style-type: none"> ES focal points assigned by GD of DSI (one for environment, one for social and one for OHS). 	Action Plan
2.	<ul style="list-style-type: none"> Since most of the sub-projects are exempt from EIA Regulation and construction works are ongoing at all sites, the ES and OHS monitoring and supervision function of DSI for construction activities needs to be strengthened to ensure strict compliance with ES and OHS legislation (Enhanced on-site ES and OHS monitoring and supervision of construction works is required). 	<ul style="list-style-type: none"> GD of DSI will prepare environmental, health and safety monitoring checklist and monthly ES monitoring report format to be used for the RBP. 	DSI	<ul style="list-style-type: none"> Within one month from loan effectiveness 	<ul style="list-style-type: none"> The environmental, health and safety monitoring checklist and the monthly ES monitoring report format prepared by GD of DSI and approved by the AIIB. 	Action Plan
		<ul style="list-style-type: none"> GD of DSI (through its regional directorates) will regularly monitor and supervise construction activities to ensure that contractors strictly comply with relevant ES and OHS legislation, including at least monthly ES and OHS site visits. The Regional Directorates of DSI will submit monthly reports to GD of DSI. This will include completion audit of each sub-project at the end of construction activities. 	DSI	<ul style="list-style-type: none"> Within one month from loan effective and throughout the construction phase of sub-projects 	<ul style="list-style-type: none"> Respective Regional Directorates of DSI prepared monthly ES monitoring reports and submitted to the GD of DSI. 	Action Plan
		<ul style="list-style-type: none"> GD of DSI will adopt ES monitoring and reporting 	DSI	<ul style="list-style-type: none"> Year 1 onwards 	<ul style="list-style-type: none"> GD of DSI prepared and submitted ES compliance 	Action Plan

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
		system for RBP.			reports to the AIIB biannually.	
3.	<p>Redress Mechanism: In-line with national legislation, DSI shall respond to written grievances submission of petitions via physical or digital platforms within 15 days. The grievance redress mechanism shall be strengthened to ensure that verbal complaints or requests are recorded and responded to in a timely manner.</p> <ul style="list-style-type: none"> Roles of village leaders in the GRM will be strengthened in sending the issues to DSI Regional Directorate and monitoring implementation of measures to manage the advert impacts of the RBP. 	<ul style="list-style-type: none"> The General Directorate of DSI will instruct Regional Directorates and contractors to record all verbal grievances received. These records will be included in monthly reports prepared during monitoring activities under Action 2. Communication channel will be agreed between the Regional Directorate of DSI with the village leaders of the RBP area and also in the seven basins. Simple guidance will be provided by the Regional Directorate of DSI to the village leaders. Village leaders can send complaints related to the RBP to the Regional Directorate of DSI and monitor the implementation of measures to manage advert impacts of the RBP. 	DSI	<ul style="list-style-type: none"> Throughout the project 	<ul style="list-style-type: none"> Inform the Regional Directorate and Contractor. Number of grievances of project affected persons reported and resolved within stipulated time. Communication channel will be agreed between the Regional Directorate of DSI with the village leaders of the RBP area and also in the seven basins. Guidance on reporting complaints and monitoring the implementation of measures to manage advert impacts of the RBP will be provided to the village leaders. 	Action Plan
4.	<ul style="list-style-type: none"> Payment of compensation sufficient to cover the cost of replacement for affected land and structures ; ; protect rights and compensation for the losses of affected informal users, ensure income and livelihoods restored by severely affected households, 	<ul style="list-style-type: none"> DSI is to continue applying its internal legislation and practices paying compensation sufficiently to cover full replacement cost for affected lands and assets, and protect rights and compensation for the losses of affected informal users. 	DSI	<ul style="list-style-type: none"> Within one month from loan effectiveness and during the RBP implementation 	<ul style="list-style-type: none"> The land acquisition monitoring report template prepared by DSI and approved by the AIIB. Biannually land acquisition monitoring report prepared by the DSI submitted to the AIIB. 	Action Plan

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
	vulnerable affected households, including informal users.	<ul style="list-style-type: none"> • GD of DSI will prepare land acquisition checklist format, including also the indicators of compensation by replacement cost, protect rights and compensate for losses of informal users, and livelihood restoration of severely affected households and vulnerable affected households by the RBP, including informal users. • GD of DSI (through its regional directorates) will monitor regularly land acquisition progress including compensation payment unit rate, compensation for informal users, and livelihood impacts of severely affected households and vulnerable affected households, including informal/secondary users. • DSI will assess impacts on severely affected households, vulnerable affected households, including secondary/informal users; if needed (livelihoods of the households are not restored), prepare and implement additional support measures or a Livelihood Restoration Program (LRP) for the households. 				

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
5.	<ul style="list-style-type: none"> Although there is legislation in Türkiye that protects women's rights, differences in implementation, invisible barriers, and cultural and structural factors can limit the actual protection of women. To ensure that women and girls are not adversely affected by activities under the RBP, local females can participate in the RBP activities, gender benefits brought about by the RBP, and to facilitate gender equality and gender empowerment, gender-related parameters will be assessed and a Gender Action Plan will be prepared for implementation for the RBP. 	<ul style="list-style-type: none"> Assessment will be conducted to identify the gender impacts of RBP during preparation, implementation and operation of the RBP. Based on the assessment and consultation, measures to manage the identified impacts; measures to ensure local females can participate in the RBP's activities; and measures to ensure women are benefited from the RBP's activities will be prepared. In addition, measures to promote gender equality and gender empowerment will also be explored. A Gender Action Plan will be prepared for implementation (with the gender measures, institutional arrangements for implementation and monitoring, budget, time-schedule of implementation and monitoring, monitoring indicators, and reporting mechanism). 	DSI	<ul style="list-style-type: none"> Within three months from loan effectiveness 	<ul style="list-style-type: none"> A gender assessment is conducted and a Gender Action Plan is prepared for implementation. The agreed Gender Action Plan is implemented and monitored (Monitoring is integrated in Action 2). 	Action Plan

1. Overview

1.1. Background

Türkiye faces growing challenges in water resource management due to rising climate variability, increasing water demand, and the need for more resilient, efficient infrastructure. Irrigated agriculture accounts for a significant share of water use, yet traditional open canal systems lead to high conveyance losses and inefficient water distribution. At the same time, flood risks have intensified in several regions, threatening communities and critical infrastructure.

To address these challenges, the Government of Türkiye has launched a comprehensive program under the Twelfth Development Plan (The Plan) (2024–2028) and the General Directorate of State Hydraulic Works (DSI) Strategic Plan, focusing on modernizing irrigation systems, improving water efficiency, and strengthening flood risk management. The proposed results-based project (RBP) builds on these national priorities and introduces a performance-driven approach to accelerate implementation in selected high-impact areas.

The RBP will support:

- **Irrigation modernization** through pressurized pipe networks (including drip and sprinkler systems), energy-efficient pumping stations, and automation and smart metering systems to significantly improve water-use efficiency, reduce water losses and optimize energy use.
- **Flood risk management** through structural measures such as flood traps in upper catchments, river training and embankment works, reclamation benches, and debris control structures, complemented by basin-level planning tools, flood hazard mapping, early warning systems, and community preparedness.

By targeting priority basins and flood-prone regions, the RBP aims to enhance climate resilience, safeguard livelihoods, and strengthen institutional capacity for sustainable water management.

1.2. Objectives of the Environment and Social Systems Assessment

An Environmental and Social Systems Assessment (ESSA) has been conducted for the proposed RBP. The overall objectives of the ESSA are to (a) assess the potential environmental and social (ES) risks and impacts of the proposed RBP; (b) assess the adequacy of the systems proposed to be applied to the RBP for managing potential ES risks and impacts (c) assess the institutional capacity of DSI and involved agencies in managing ES risks and impacts of the RBP; and (d) recommend actions to strengthen specific aspects of the capacity of involved agencies and these systems for mitigating ES risks and impact during the preparation and implementation of the RBP. Outcomes of the assessment would help the RBP to avoid, minimize, or mitigate ES adverse impacts; promote ES sustainability in the RBP design; help clients strengthen their ES systems and develop adequate capacity to manage ES risks and impacts; and promote informed decision-making regarding the RBP's ES effects.

1.3. ESSA Process

The following details the scope of the ESSA and the main steps conducted during the ESSA for the proposed RBP:

- Review of the government program and identification of critical information for the part of the program funded by the Asian Infrastructure Investment Bank (AIIB).
- Screening and assessment of the potential ES effects of the activities, such as installation of pressurized irrigation pipelines, modernization of existing open canal systems, deployment of automated flow meters, construction of flood control structures (e.g., embankments, benches) supported by the RBP.
- Screening out high ES risk activities and those included in the Environmental and Social Exclusion List (ESEL), as per AIIB's Environment and Social Policy (ESP).
- Assessment of the existing ES management systems (ESMS) applicable to the RBP using information collected both from primary and secondary sources.
- Assessment of the applicability of relevant national laws and legal frameworks on ES assessment and management.
- Assessment of DSI's institutional capacity and implementation practices involved in the management of ES impacts within the RBP, including constraints (staffing, budget, etc.) that would affect ES management of the RBP.
- Assessment of the program system performance at all levels, including planning, implementation, and monitoring of the RBP.
- Recommendation of actions to improve the performance of existing systems to make sure they are adequate to identify, minimize/mitigate, and manage ES risks and impacts, consistent with the core principles of the Results-Based Financing (RBF) modality.²

The methodology for ESSA included both secondary literature review and primary data collection. The Project Team reviewed the relevant secondary literature prior to and during the conduct of the ESSA. The key documents included applicable Acts, Rules, policies, Government Orders, Circulars, Gazette notifications, guidelines, reports and studies commissioned as part of program preparation. For primary data, the Project Team held meetings and discussions with representatives of DSI including regional directorates and Water Association Unions, vendors of Irrigation Automation System, construction contractors, field staff of DSI, and beneficiaries (farmers, mukhtars³). Field visits were also conducted to sites in Adana and Mersin provinces to assess the potential ES impacts of the RBP and carry out consultations with local communities.

² The core principles of the RBF modality are defined by Paragraph 15.1 of AIIB ESP (2022 version).

³ Article 127 of the Constitution of the Republic of Türkiye defines "mukhtars" as public legal entities formed by voters, whose decision-making bodies are specified by law, to meet the common local needs of the residents of provinces, municipalities, and villages.

2. RBP Description

2.1. Overview of the Government Program

The Government of Türkiye's comprehensive water resources and climate resilience program under its Twelfth Development Plan (2024–2028) was designed with a long-term vision extending to 2053. This program prioritizes improving water efficiency, modernizing irrigation systems, and strengthening flood protection measures in response to increasing climate variability, water scarcity, and growing demand for resilient infrastructure. These priorities are supported by basin-level flood management plans, legal and regulatory instruments aimed at minimizing flood impacts and associated risks, and the continued expansion of national flood and drought forecasting and early warning systems across river basins.

Aligned with the national development agenda, the DSI Strategic Plan (2024–2028) outlines a USD22 billion investment framework across key water sector pillars, including drinking and utility water, irrigation efficiency, flood management, water resource monitoring and research, hydropower, and institutional strengthening. Within this framework, irrigation modernization and flood management dominate the expenditure portfolio, reflecting the critical importance of securing agricultural productivity and protecting communities from increasing climate-related risks. The government aims to expand climate-resilient and efficient irrigation over 0.75 million hectares (ha), rehabilitate an additional 0.23 million ha, improve irrigation efficiency from 51% to 56%, and raise irrigation service coverage from 68% to 72%. Concurrently, flood resilience investments will increase the number of flood control facilities and early warning systems across river basins, targeting the safety of settlements and agricultural lands through structural controls, debris retention structures, and watershed protection measures.

AiIB will support a dedicated slice of this national program through a Türkiye RBF for Water Resources and Flood Control operation, with a financing envelope of USD500 million within a program boundary of USD10.4 billion. The RBP will focus on accelerating climate-resilient irrigation and flood management investments. Specifically, it will scale up pressurized irrigation systems across seven priority basins, modernizing more than 44,000 ha and improving agricultural water efficiency and basin-level management. The program will also support the design and implementation of priority flood management infrastructure, to be finalized at appraisal, targeting high-risk flood-prone areas.

Through this RBF, approximately 113,000 people are expected to benefit from improved irrigation systems and over 431,000 beneficiaries will be directly and permanently protected by enhanced flood control infrastructure. The program builds on Türkiye's strong institutional and technical capacity and reinforces government priorities for climate adaptation, efficient water use, and disaster resilience. By leveraging existing government systems and DSI's established implementation capacity, the RBF will accelerate tangible, sustainable results in water security and climate resilience, aligned with national strategic goals and AiIB's Water Sector Strategy.

2.2. Defining RBP Scope

2.2.1. RBP Development Objective/s (PO)

The RBP aims to enhance water conveyance efficiency and climate resilience in Türkiye’s water-scarce and flood-prone regions by promoting modern, pressure-regulated irrigation systems and strengthening flood control capacity.

2.2.2. Thematic Scope of the RBP

The boundary of the AIIB-financed RBP is covered in the table below. It includes the boundaries of the government programs and the AIIB-financed RBP, including their objectives, geographic coverage, costs, targets and achievements, and results areas.

Table 1. RBP Boundary

Aspect	Government Program	AIIB-financed RBP
Objective	To modernize irrigation systems and strengthen flood risk management nationwide, improving water security and climate resilience.	To improve water use efficiency in irrigated agriculture and enhance flood risk management in selected river basins.
Geographic Coverage	Entire Türkiye, covering multiple basins and flood-prone areas under DSI’s mandate.	Subnational: Selected seven basins including five basins (five provinces) for irrigation projects, and three basins (six provinces) for flood control projects. Since one of the basins in which flood control and irrigation projects will be implemented is a shared one (the Kizilirmak Basin), the projects will be implemented across a total of seven different river basins.
Targets / Achievements	Modernization of irrigation networks across multiple basins; flood protection infrastructure nationwide.	Modernization of ~44,000 ha irrigation; flood protection benefiting ~431,000 people; installation of smart systems and early warning mechanisms.
Timeline	2024–2028 (aligned with Twelfth Development Plan and DSI Strategic Plan).	2026–2031 (phased implementation under RBF).
Results Areas	<ul style="list-style-type: none"> • Increased water efficiency and climate resilience. • Strengthened institutional capacity. • Enhanced disaster preparation. 	<ul style="list-style-type: none"> • Expanding access to efficient climate-resilient irrigation services for improved water and land use. • Improving climate resilience of the existing irrigation systems; • Enhancing climate resilience of flood-prone areas.

2.2.3. RBP Key Result

The Results framework will include three main Results Areas:

- (a) **Results Area 1: Expanding access to efficient climate-resilient irrigation services for improved water and land use.** The expansion of new irrigation areas will be guided by an integrated approach that combines phased, smart technology-driven extension of irrigation infrastructure with downstream land consolidation, supported by farmers' engagement and complementary on-farm investments. Climate-resilient irrigation services are defined as irrigation services delivered to a newly developed command area of target irrigation systems that meet pre-defined climate-resilience criteria embedded in the system design. These criteria include (a) closed, piped conveyance systems to minimize conveyance losses and enhance reliability of bulk irrigation delivery; (b) volumetric measurement and monitoring of irrigation water delivery in conveyance systems to support efficient allocation and operational control; and (c) provision for adequate pressure regulation to enable further roll-out of water-efficient on-farm irrigation technologies, such as drip and sprinkler systems, thereby improving resilience to water scarcity and climate variability. The RBP will support the installation of efficient conveyance irrigation systems, utilizing pressurized pipe systems. These systems will be enabling the further roll-out of controlled use of Water Conservation and Saving Technologies (WCST)—such as drip and sprinkler irrigation systems. At the system level, the RBP-financed activities aim to minimize conveyance losses and optimize crop water productivity in the face of increasing climate variability.
- (b) **Result Area 2: Improving climate resilience of the existing irrigation systems.** The RBP will focus on modernizing existing irrigation by replacing obsolete conveyance canals with closed pressurized pipe networks, enabling volumetric water delivery for improved water regulation and operational control. This upgrade of traditional irrigation conveyance systems will substantially improve irrigation efficiency, reduce labor intensity of future operation and maintenance, and prevent drainage and salinity issues, thereby enhancing the efficiency and climate resilience of irrigation operations in the target area, with particular emphasis on reliable water delivery.
- (c) **Result Area 3: Enhancing climate resilience of flood-prone areas.** This result area focuses on infrastructure investments in construction and upgrade of flood control facilities built in rivers and on-stream beds. Key interventions include installing flood traps in upper basins of the rivers and streams for flood peak control, reclamation benches for energy control, and other river embankment works and weirs for debris management. Flood risk and damage-reduction riverbed arrangements include embanked or walled bed arrangements and longitudinal and transverse structures, such as spurs or slope-regulation structures. These activities aim to increase the climate resilience of agricultural land, populations, and their livelihoods and assets exposed to flood hazards.

2.2.4. Disbursement Linked Indicators

Nine disbursement-linked indicators (DLIs) and other non-disbursement-linked PO and IR indicators have been discussed with the DSI. When requesting disbursement, DSI, as the designated implementing agency, must provide AIIB with documentation that the agreed results have been achieved. Third-party verification will be required to support DSI in their request to support the claims. The funds will be channeled to the Ministry of Trade and Finance (MoTF).

Rationale for Disbursement Linked Indicators (DLIs). The RBP Results Chain is carefully designed to align financial incentives with the critical milestones necessary for the program's successful implementation. The DLIs are formulated to track progress on the key dimensions of the RBP, considering the following elements: (a) the selected DLIs are aligned with the targets included in the government program; (b) the DLIs are considered achievable during the RBP period; (c) the DLIs are quantifiable, measurable and verifiable, and (d) the DLIs are within DSI's control. The DLIs represent a mix of process-oriented outputs and concrete outcomes, at the level of the project objectives, serving as proxies of impact on the ground. DSI agreed to use nine DLIs as metrics for measuring disbursement-linked results (DLRs). A rationale for their selection is summarized as follows:

Rationale for Disbursement Linked Indicators (DLIs). The results chain (Figure 2) highlights the key RBP results indicators, carefully designed to align financial incentives with the critical milestones necessary for the program's successful implementation. The DLIs are formulated to track progress on the key dimensions of the RBP, considering the following elements: (a) the selected DLIs are aligned with the targets included in the government program; (b) the DLIs are considered achievable during the RBP period; (c) the DLIs are quantifiable, measurable and verifiable, and (d) the DLIs are within DSI's control. The DLIs represent a mix of process-oriented outputs and concrete outcomes, at the level of the project objectives, serving as proxies of impact on the ground. DSI agreed to use the following DLIs as metrics for measuring disbursement-linked results (DLRs). Annex 1(b) includes a Table of DLIs and rationale for their selection summarized as follows:

Results Area 1: Expanding access to efficient climate-resilient irrigation services for improved water and land use.

(a) **DLI 1 - Land area equipped for new climate-resilient irrigation services expanded.**

This DLI tracks progressive expansion of land area with climate-resilient irrigation services enabled through extension and modernization of three gravity-fed schemes and one pumped scheme. Disbursements are directly linked to the completion and verification of all physical works by sections, ensuring that financial support aligns with tangible infrastructure development on the ground. By linking disbursement to completed investment milestones, the DLI incentivizes timely completion of works combined with volumetric measurement and regulation of irrigation supply to the targeted command area. Verification of this DLR requires proof of completed civil works by section in target schemes and a demonstration that water is successfully delivered to the designated command area. DLI 1 directly contributes to PO 1. Progress under DLI 1 provides the physical basis for subsequent improvements in

land consolidation, scheme management, and conveyance efficiency, supporting a higher-level PO 4.1.

- (b) **DLI 2 - Length of irrigation pipelines installed.** This DLI tracks the annual length of irrigation pipelines installed across three gravity-fed schemes and one pumped scheme. Disbursements are directly linked to the completion and verification of physical works, associated with laying and testing of the pipelines, ensuring that financial support aligns with tangible progress in the development of conveyance and transmission infrastructure on the ground. The installed pipelines also provide essential infrastructure to support the expansion of land equipped with climate-resilient irrigation services under PO 1, and the corresponding increase in beneficiaries under PO 2. DLI 2 directly contributes to PO 4.1 by avoiding conveyance losses, traditionally observed in open canal systems, improving flow regulation and reliability of water delivery to targeted command areas.
- (c) **DLI 3 - Number of flow measurement structures with flow meters installed in the new irrigation systems.** This DLI tracks the annual number of flow measurement structures with flow meters installed in the new irrigation systems across three gravity-fed schemes and one pumped scheme. Disbursements are linked to the completion and verification of these installations, ensuring that financing is tied to tangible functionality of the flow measurement and pressure regulating structures rather than inputs alone. DLI 3 directly contributes to PO 3 by enabling water regulation, volumetric measurement and reliable data generation for operational control and monitoring. This DLI underpins transparent water allocation, improved operational control, thereby contributing to monitoring of conveyance efficiency and service reliability expected under POs 3 and 4.1.

RBP Results Area 2: Improving climate-resilience of existing irrigation systems

- (d) **DLI 4 – Land area equipped for improved climate-resilient irrigation services expanded.** This DLI tracks the irrigated command land area where the existing irrigation conveyance system is converted from open-channel traditional irrigation system to a closed piped conveyance system. Disbursements are directly linked to the completion and verification of all physical works by complete sections, ensuring that financial support aligns with on-the-ground tangible infrastructure development. By tying the results to completed investments, DLI incentivizes the timely completion of works and land consolidation efforts, as well as the volumetric measurement and regulation of irrigation supply to the target area. Progress under DLI 4 provides the physical basis for subsequent improvements in land consolidation, scheme management and irrigation conveyance efficiency, contributing to PO 5 and supporting PO 4.2.
- (e) **DLI 5: Length of irrigation pipelines installed as part of the rehabilitation and upgrade of the target irrigation systems.** This DLI tracks the annual length in kilometers of irrigation pipelines installed to replace the existing open-channel

conveyance system. Disbursements are directly linked to the completion and verification of physical works, ensuring that financial support aligns with tangible progress in the rehabilitation and upgrade of on-the-ground conveyance and transmission infrastructure. DLI 5 directly contributes to PO 4.2 by reducing conveyance losses, improving flow regulation, and strengthening the reliability of water delivery to targeted command areas. The installed pipelines also provide essential infrastructure that supports the expansion of land equipped for improved climate-resilient irrigation services under PO 5 and PO 6.

- (f) **DLI 6 - Number of flow measurement structures with flow meters installed as part of the rehabilitation and upgrade of targeted irrigation systems.** This DLI tracks the annual number of flow measurement structures with flow meters installed as part of the modernization of the existing irrigation system at water intake points. Disbursements are linked to the completion and verification of these installations, ensuring that financing is tied to tangible functionality of the flow measurement and pressure regulating structures rather than inputs alone. DLI 3 directly contributes to PO3 by enabling volumetric measurement, flow regulation, and reliable data generation for operational control and monitoring. By strengthening the capacity for accurate water measurement and reporting, the DLI also supports improvements in conveyance efficiency and service reliability reflected under PO 4.2 and facilitates equitable and transparent water allocation to areas under PO 5.

RBP Results Area 3: Enhancing climate resilience of flood-prone areas

- (g) **DLI 7: Land area with reduced risk of flooding due to completed and commissioned flood control facilities.**⁴ Given the heterogeneity of flood protection interventions across the six flood-control sub-projects, unit costs per hectare vary significantly depending on the complexity and type of work. Accordingly, the RBP assigns a standard value of USD132,279 per hectare of land benefiting from reduced flood risk as a result of completed and commissioned flood control facilities, as delineated in the approved flood footprint maps. The land area metric is used to consistently measure and aggregate the spatial extent of benefits across sub-projects, rather than to standardize or reimburse actual unit costs, as acceptable under the RBF modality. Disbursements are triggered only upon full completion, commissioning, and independent verification of the flood control facilities under each sub-project, in accordance with approved technical designs and performance standards, and confirmation of their functionality and O&M arrangements. Upon completion of each sub-project, the verified land area benefiting from reduced flood risk is deemed fully achieved for DLR verification purposes. This DLI directly contributes to PO 7 (Land area with reduced risk of flooding) and provides the physical basis for PO 8 (Number of people benefiting from flood control facilities).

⁴ In line with the DSI Strategic Plan verified through the project appraisal, flood control facilities are a system of engineered hydraulic and structural units designed and constructed to prevent, reduce, or control flooding by containing, diverting, regulating, or safely conveying floodwaters, thereby reducing flood risk to people, land, and assets within the protected area. The DLI is defined as completion and commissioning of flood control facilities in accordance with approved designs and performance standards, confirming their functionality and O&M arrangements.

2.3. Geographic Coverage of the RBP

The geographical area of investments has varying levels of water scarcity, drought and flood risk, with important implications for rural livelihoods and food production resilience. Hatay and Mersin are provinces with the highest combined exposure to water scarcity, drought and flood risk. These provinces, from an irrigation perspective, have high irrigation intensity, making them more dependent on a reliable and efficient water supply. Burdur's irrigation demand is moderate, while Nevşehir falls in the low-to-medium range. Ordu and Düzce present flood exposure despite having only moderate drought sensitivity. Çankırı, Kastamonu, and Bartın are characterized by very low drought risk; however, the latter two still face moderate to high flood exposure.

2.4. Key Implementing Agency

The MoTF is the focal ministry for RBP implementation representing the Government of Türkiye and coordinating with AIIB, DSI, and SBO. Its key responsibilities are: (a) RBP oversight; (b) legal agreements; (c) effectiveness; (d) disbursements for initial advances, additional advances, DLRs/DLI's achievements, including those already achieved; (e) deducting advance upon achievements of results; (f) refunding the excess RBF amount exceeding the total amount of expenditures; (g) refunding the advance for unachieved results; (h) submitting audit reports; (i) coordinating implementation support missions; (j) reporting RBP changes; (k) approving the POM (Project Operational Manual) and POM updates in consultation with AIIB; (l) advising SBO on budgetary allocation to RBP sub-projects; (m) nominating the focal for RBP oversight, implementation and coordination; and (n) closing the loan.

The SBO is the focal institution for RBP planning and budgeting. Its key responsibilities are: (a) annual planning, budgeting, allocation and releasing financing for RBP sub-projects expenditures; (b) allocating sufficient budgetary financing for sub-projects for progress and results in coordination with DSI; and (c) ensuring that designated RBP sub-projects are appropriately reflected within the Annual Investment Program in accordance with national investment planning and budgeting procedures, and reporting the relevant expenditure, allocation, and release information to MoTF. The MoAF is the focal ministry for oversight on DSI. It is a line ministry with key responsibilities of supporting DSI in RBP implementation and results achievement.

DSI is the key implementing entity for the RBP. Its key responsibilities are: (a) sub-projects implementation and DLRs/DLIs achievements; (b) fiduciary, procurement, environmental, social, and gender compliances; (c) quarterly reporting to MoTF and AIIB; (d) designating a focal unit and persons for RBP implementation for coordination, M&E, and Environmental and Social (ES); (e) reporting and forecasting periodic expenditure and financing requirements; (f) appointing an IVA; (g) submitting IVA verification reports to AIIB for approval; (h) submitting AIIB's approval of the IVA report to the MoTF; and (i) drafting and updating POM for submission to MoTF.

DSI is a special centrally budgeted organization subject to the national government budget, responsible for planning, managing, developing and operating water resources in Türkiye.⁵ DSI

⁵ DSI Charter. <https://www.dsi.gov.tr/>

implements its mandate through 26 regional directorates and over 23,000 personnel. DSI has a significant design and construction management capacity, demonstrated by impressive 1,948 water storage facilities constructed over the period of 1923-2024, adding 183.4 billion m³ of storage capacity. For groundwater recharge, DSI also created 50 million m³ of storage. DSI plays an important role in food security by managing irrigation infrastructure and improving water-use efficiency. As of 2024, DSI has installed more than 3,500 irrigation systems across 7.2 million ha and over 100,000 km of pipes. DSI undertakes land consolidation activities, contributing to sustainable agriculture and the efficient use of natural resources and rural development, with 7.58 million ha of land registered. DSI has long-standing experience in implementing large-scale irrigation and flood control programs, including MDB-financed projects, and in managing them in a technically robust manner.

The implementation of the RBP will rely on existing national institutional systems and clearly defined roles and responsibilities within DSI and its associated departments. These arrangements are consistent with AIIB's ES Framework and ESSA methodology, which emphasize the use and strengthening of country systems for managing ES and OHS risks. The following sections summarize the current mandates of the key implementing agency and its associated departments and outline their specific roles and responsibilities under the RBP.

- For the RBP, DSI will be responsible for ensuring compliance with agreed program requirements, overseeing procurement and contract management, monitoring achievement of results and disbursement-linked indicators, and ensuring that environmental, social, and OHS risks are managed in accordance with national legislation and RBP requirements.
- **The Department of Real Estate and Expropriation** is responsible for land acquisition, expropriation, and associated social processes within DSI investments, including compensation and grievance management. Under the RBP, this department will manage any land acquisition requirements arising from eligible irrigation and flood control sub-projects, ensuring that these processes are carried out in compliance with national legal frameworks and that social risks and impacts are addressed in a timely, transparent, and documented manner.
- **The Investigation Planning and Allocation Department** leads technical investigations, feasibility studies, planning, and water resource allocation activities, including hydrological and hydraulic analyses at basin level. Within the RBP, this department will support the identification, screening, and technical preparation of eligible sub-projects, ensuring alignment with basin management plans, climate resilience objectives, and water allocation priorities, and integrating environmental considerations at the early stages of project planning.
- **The Environment Branch Office**, operating under the Investigation Planning and Allocation Department, is responsible for environmental screening, permitting, monitoring, and compliance with national environmental regulations. For the RBP, the Environment Branch Office will lead the management of environmental risks and impacts associated with program activities, oversee the preparation and implementation of environmental instruments where required, and monitor compliance during

implementation, including issues related to resource efficiency, and environmental protection.

- **The Support Services Department** provides administrative and operational support functions, including procurement coordination and oversight of OHS arrangements. Under the RBP, the department will support procurement and contract administration processes and ensure that contractors' performance is consistent with contractual obligations, particularly with respect to OHS requirements during construction and implementation.
- **The Occupational Health and Safety Branch Office**, under the Support Services Department, is responsible for developing and overseeing OHS policies and practices within DSI projects. Under the RBP, the OHS Branch Office will monitor contractor compliance with national OHS legislation, conduct inspections as needed, and support the prevention and management of worker health and safety risks throughout construction and maintenance activities.
- **Water User Associations** are responsible for the operation and routine maintenance of irrigation schemes following construction. The heads of WUAs are appointed by DSI among DSI staff, ensuring institutional oversight and coordination. Under the RBP, WUAs will manage day-to-day irrigation operations, water distribution, and minor maintenance, while coordinating with DSI to support efficient water use, system sustainability, and compliance with applicable operational and environmental requirements.

2.5. Screening and Exclusion of High ES Risk Activities.

Activities that the Bank determines are of high ES risk are not eligible for financing under the RBF and are excluded from the RBP. The following are the criteria for the exclusion of high ES risk activities applied on this RBP:

- (a) All Category A activities following the provisions of AIB's ESP.
- (b) All Category B activities that are likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or Project-affected People.
- (c) Activities/sub-projects that would result in significant adverse impacts on protected areas or biodiversity areas as defined by national law and/or on critical natural habitats.
- (d) Activities that would adversely affect places of cultural significance and/or protected historical/archaeological assets (both natural and human-made).
- (e) Activities that would result in any large physical displacement in government land and private land acquisition (from more than 200 persons or 64 households⁶), including activities that may involve or result in forced eviction. The RBP shall exclude provision of irrigation services to the land area that has been or is being consolidated where concerns of forced eviction exist.
- (f) Activities/sub-projects involving construction of any new dam or rehabilitation of existing dams.
- (g) Activities/sub-projects that have not completed the national environmental impact assessment (EIA) process.

⁶ According to 2024 Statistical Data, the average household size in Türkiye is 3.11 persons, so 200 affected persons is about 64 households.

(h) Activities and items listed in the ESEL.

As part of the ESSA, the Project Team assessed the activities under the proposed RBP by DSI, and it confirms that the RBP does not include any high ES risk activities and activities under ESEL. The exclusion criteria have been discussed with and agreed upon by the DSI. As assessed in Annex 1, all of the sub-projects are categorized as Category B with limited adverse ES impacts. The risks and impact of the activities under the RBP are site-specific, largely reversible, and can be managed using good practice in an operational setting.

The RBP activities have also been assessed to determine whether it involves any associated activities as defined in the AIIB's ESP. The assessment revealed that there are no associated facilities (AF) under the RBP. Quarries, borrow pits, or concrete plants that might be needed for associated construction activities within the scope of the RBP have been considered as auxiliary facilities of the sub-projects⁷ that are either part of the RBP or serve multipurpose functions. There will be no dam construction and rehabilitation within the scope of subprojects. However, dams supplying water to the proposed irrigation sub-projects (five sub-projects in total) have been assessed in terms of AF. As elaborated in

Table 2, it is determined that these dams are not considered AF. There will not be any high-voltage (154 kilovolts [kV] or above) transmission lines within the scope of sub-projects.

The Bank's Operational Policy on International Relations (OPIR) applies to the Project because one irrigation subproject is located within the Asi basin and seven others are situated within basins that drain to the Black Sea. A comprehensive technical assessment of the sub-project in the Asi Basin confirmed that it will not alter the quantity, quality, or timing of water flows to other riparians. Regarding the six flood control sub-projects within the Bati Karadeniz, Kizilirmak, and Yesilirmak basins draining to Black Sea, and one irrigation subproject situated in Kizilirmak Basin over 500 km from outfall point in the Black sea, any potential downstream impact is minimal. These activities are further governed by Türkiye's robust regulatory framework for water quality, sediment control, and environmental protection and the RBP Action Plan's monitoring measures.

Based on the findings of the technical assessment, it is concluded that the proposed sub-project activities are expected to have minimal or no effect on the other riparians. Consequently, pursuant to Section 3.3 (c) (i) of the OPIR, the notification requirement does not apply.

Additionally, during the ESSA consultations with relevant stakeholders, it was determined that there is no legacy and/or ongoing outstanding ES issues related to the proposed RBP activities.

⁷ Materials required for the construction of sub-projects are either supplied from licensed quarries and facilities that operate in accordance with environmental legislation, or such facilities (e.g., quarries, borrow pits, crushing and screening facilities, concrete plants, etc.) are established by the Contractor as part of the sub-project, in compliance with environmental legislation.

Table 2. Associated Facilities Assessment of Dams Supplying Water to Proposed Irrigation Sub-projects

No	Sub-project	Dam Supplying Water to the Irrigation Project	Primary and Other Purposes of Dam	Construction Completion Year	Considered AF when all three criteria are met			Conclusion
					Directly and materially related* to the Project	Carried out, or planned to be carried out, contemporaneously** with the Project	Necessary for the Project to be viable*** and would not be carried out if the Project did not exist	
1	Burdur-Golhisar Irrigation Rehabilitation	Yaprakli Dam	Irrigation (<i>water supply</i>)	1991	Yes	No	No	Not an Associated Facility
2	Hatay Amik-Afrin Reyhanli Dam Irrigation 1st Section Completion	Reyhanli Dam	Irrigation and flood (<i>water supply</i>)	2019	Yes	No	No	Not an Associated Facility
3	Aydin Cine Kocarli Bagarası Irrigation 2nd Section Completion	Cine Dam	Irrigation and energy (<i>water supply</i>)	2014	Yes	No	No	Not an Associated Facility
4	Mersin-Pamukluk Dam Irrigation Completion 2nd Part	Pamukluk Dam	Irrigation and energy (<i>water supply</i>)	2019	Yes	No	No	Not an Associated Facility
5	Bayramhacili Pump Irrigation	Bayramhacili Dam	Irrigation and energy (<i>water supply</i>)	2008	Yes	No	No	Not an Associated Facility

* Does the Facility provide essential inputs, material influence, or services to the project?

** Is the AF planned/operated during the project's preparation/operation stage? Example of contemporaneous: AF constructed shortly before the project is operational, but construction of the AF and the construction of the project was not done in parallel. "Contemporaneous" does not necessarily mean "simultaneous," or coinciding precisely. Determination of a "contemporaneous" relationship requires the use of good professional judgement. The relevant period will depend on the circumstances but would generally be considered to start at the time of the project identification mission by the Bank.

*** If the Facility did not exist, could the project still operate and function as designed? Would the Facility still be built in the absence of the project?

2.6. Identifying the Expected ES Effects of the RBP

When assessing and describing the potential ES effects of the RBP (Annex 1), the ESSA considers the core principles and core elements⁸ that are envisaged in the ESP and the Interim Guidance Note on RBF. The ES effect screening for the RBP considered (a) likely ES risks, impacts and benefits of the RBP; (b) contextual risk; (c) institutional capacity and complexity and (d) reputational risks. The potential ES risks, impacts, and benefits (direct, indirect, induced, temporary, permanent, and cumulative) that are related to the RBP have been summarized below and highlighted in Annex 1. There are no contextual risks in the RBP areas that may influence DSI's ability to effectively identify, assess and manage ES risks, impacts, and performance of the RBF as the RBP aligns with government programs related to water efficiency and climate resilience. Considering that there will be only one implementing agency, there will not be any institutional complexities, and DSI has experience working with multilateral development banks (MDBs) on similar irrigation and flood projects. Additionally, there are no issues, trends, or other factors that might result in significant reputational risks in terms of ES.

2.6.1. Potential Environmental Impacts, Risks and Benefits

Based on the ES screening exercise conducted during ESSA preparation, the following environmental risks, impacts and benefits of the proposed RBP have been identified. Overall, the environmental impacts of the RBP will be positive. There are many potential environmental benefits and opportunities that the RBP will introduce directly and indirectly. The key environmental benefits could be summarized as follows:

- **Water Efficiency and Climate Resilience.** Modernized irrigation and flood control infrastructure reduces water losses, improves reliability of water supply, and enhances resilience to droughts and floods.
- **Agricultural Productivity and Land Protection.** Efficient water management and flood protection boost crop yields, enable crop diversification, and safeguard arable land from erosion, waterlogging, and flood damage.
- **Energy and Emissions Reduction.** Upgraded systems (pressurized, gravity-fed, energy-efficient pumps) lower energy use and greenhouse gas emissions by reducing groundwater pumping and optimizing water delivery.
- **Water Quality and Pollution Control.** Improved control and measurement minimize runoff, reduce agrochemical pollution, and support better water quality in both irrigation and flood-prone areas.
- **Soil and Ecosystem Conservation:** Modern irrigation and flood control reduce soil erosion, restore degraded lands, and protect downstream habitats and biodiversity.
- **Institutional Strengthening and Digitalization.** Introduction of smart meters, SCADA, and digital platforms improves water accounting, disaster preparedness, and adaptive management.
- **Socioeconomic and Health Co-Benefits.** Reliable irrigation and flood protection enhance food security, rural livelihoods, and public health.

⁸ The core elements of the RBF modality are defined by Section 4.4 of the RBF Interim Guidance Note (June 23, 2023).

The potential environmental risks and impacts for the sub-projects to be financed under the RBP are not expected to be significant since high ES risk activities are excluded from the RBP. The key potential environmental risks and impacts associated with both irrigation and flood control sub-projects, particularly if the design is inadequate and the mitigation measures as per national legislation are not complied with and/or not properly managed, can be summarized as follows:

- **Preparation Stage.** This stage typically involves site selection, planning, and design, where risks may arise if environmental considerations such as sensitive biodiversity and/or habitats, water resources, and community needs are not adequately assessed or integrated into project planning.
- **Construction Stage.** During construction, both types of sub-projects may cause typical construction-related impacts such as air, noise, and dust pollution from heavy machinery, excavation, and material transport, affecting local air quality and causing nuisance to nearby communities. There is a risk of waste generation that includes solid, hazardous, and wastewater from construction and demolition activities. Land clearing and earthworks can lead to soil erosion and sedimentation, destabilizing soils and impacting waterways. Water pollution may result from runoff carrying sediments, oils, and chemicals into water bodies. OHS risks to workers include accidents and exposure to hazardous materials, while community health and safety risks stem from increased traffic, open trenches, and construction hazards. Construction of flood control structures (levees, embankments, etc.) may temporarily disrupt aquatic and riparian habitats, and large-scale resource extraction (e.g., sand, gravel) can cause land degradation. Improper disposal of construction waste and cutting material can further pollute water and soil. Structural safety of flood protection works would also be a concern.
- **Operation Stage.** In the operational phase, irrigation sub-projects may lead to depletion of water resource if improved efficiency results in increased abstraction, potentially reducing availability for downstream users and ecosystems. Poorly managed irrigation can cause waterlogging and salinization, reducing land productivity. Increased use of fertilizers and pesticides may result in agrochemical runoff, contaminating surface and groundwater and harming aquatic life and human health. Expansion of irrigated agriculture can lead to biodiversity loss through encroachment of important habitats and reduced ecosystem services, with a minimal risk of invasive species introduction. For flood control sub-projects, structural measures (such as dikes and levees) can alter natural flood regimes, reducing soil fertility, groundwater recharge, and affecting floodplain agriculture, fisheries, and wildlife. Flood control structures may transfer flood risk downstream, increasing vulnerability in other areas. Channel modifications can increase flow velocity, causing erosion and sedimentation both on-site and downstream, while changes in flow and sediment transport can degrade water quality and aquatic habitats.

The consultations with relevant DSI departments determined that there will be no diversion of streams or rivers within the scope of sub-projects, and dredging of riverbeds⁹ is not foreseen.

⁹ No riverbed dredging is foreseen for the sub-projects; however, riverbed levelling may occur, particularly within the scope of flood control sub-projects. If any riverbed dredging activities are performed, the dredged material will be analyzed for potential use as a construction material. If the material is unsuitable due to its quality, it will be disposed of in accordance with the Waste Management Regulation at a licensed waste disposal facility or stored in a permitted area as per the Regulation on Excavation Soil, Construction and Demolition Waste Control.

These risks and impacts can be managed and mitigated through robust planning and with standard mitigation measures such as (a) good construction practices—implementation of dust, noise, and waste management, erosion control, and OHS measures; (b) water management—monitoring and managing water abstraction, drainage, and return flows and (c) biodiversity protection -avoiding habitats of importance.

Since the RBP instrument cannot finance any investments associated with high risk and significant adverse impacts, the eligibility criteria for financing specifically excludes these kinds of investments. Additionally, risks related to cultural heritage and biodiversity sensitive areas impacts are not expected, because investments with such impacts will not be eligible for financing under this RBP. The sub-projects were screened for such risk and impacts for RBP eligibility.

All investments to be covered by the RBP will have potential environmental, OHS issues which are expected to be (a) mostly medium in magnitude, (b) mostly temporary and spatially limited (of limited duration and extent), (c) mostly reversible, (d) predicable, and (e) readily mitigated to acceptable levels with standard cost-effective measures commercially available in Türkiye and internationally recognized best construction practices in addition to national legislation requirements. Such impacts are not expected to produce significant or irreversible adverse effects on human health and/or the environment nor result in significant adverse impacts. Potential investments will not encroach or degrade sensitive habitats (natural habitats and/or protected areas), result in significant adverse impacts on sensitive areas of biodiversity value, or adversely affect areas protected for physical tangible cultural resources.

2.6.2. Potential Social Impacts, Risks and Benefits

Overall, the RBP implementation would have various social benefits (directly and indirectly) to the local communities. The key social benefits could be summarized as follows:

- **Enhancing Agricultural Productivity and Food Security.** Modernized irrigation and flood control infrastructure ensures a climate-resilient water supply year-round, reducing crop losses from droughts and floods, and stabilizing agricultural production over time. This leads to higher yields, greater crop diversity, and improved food security for rural communities.
- **Improvement of Public Health.** Regular and controlled water management significantly reduces the spread of waterborne diseases. Well-planned drainage and flood protection systems help prevent post-flood health crises. Improved conditions for adequate, healthy nutrition lead to a decrease in diseases and an overall increase in quality of life.
- **Increased Income and Employment.** Increased agricultural production and reduced risk of crop loss translate into higher incomes for farmers and rural households. At the same time, both irrigation and flood control projects create direct and indirect employment opportunities during construction and operation phases. Improved rural roads and infrastructure through these projects facilitate access to markets, stimulate local economies, and support small and medium-sized enterprises.
- **Empowerment of Water User Associations.** Local governance and participatory decision-making processes are supported. Through improved infrastructure, modern water

measurement and management systems, and capacity-building activities, WUAs can deliver more reliable and equitable irrigation services. Enhanced transparency, reduced operation and maintenance burdens, and increased farmer participation improve governance and trust, enabling WUAs to function as sustainable, efficient, and locally accountable institutions.

- **Strengthening Community Resilience.** Flood control systems protect settlements and agricultural lands, minimizing loss of life and property. The financial and social burden of post-disaster recovery is reduced, and community resilience to disasters is increased. This also helps reduce pressure for migration and displacement, supporting social stability.
- **Access to Water and Equity.** The fair distribution of water resources facilitates access for disadvantaged groups. This supports social equity and improves living standards in rural communities.
- **Gender Equality Benefits.** The RBP sets targets for women's participation, and promote women's leadership in water management, contributing to their economic and social empowerment.
- **Safer Living Conditions.** Flood control infrastructure protects homes and public assets, reducing injuries, displacement, and psychological stress during disasters.
- **Support for Rural Development.** Irrigation and flood control systems encourage rural investments such as roads, marketplaces, and energy infrastructure. This fosters the development of agriculture-based industry and commerce, improving the quality of life in rural areas. In the long term, these projects become one of the cornerstones of sustainable rural development.

The social risks and impacts of the RBP are expected to be minor and can be managed through mitigation strategies built into the RBP design as well as the RBP Action Plan. The following potential risks and impacts of the RBP are identified during the ESSA:

- **Risks and impacts during RBP preparation.** Key risks and impacts of the RBP during preparation stage include (a) land acquisition and resettlement, (b) gender-related risks and impacts, (c) social exclusion risks.
 - **Land Acquisition and Resettlement.** In sections that require permanent land for the installation of pipelines, canal expansion, and associated structures construction, land expropriation will be applied. Under the RBP, there are 25 households (76 persons) who will be physically displaced. Their residential land is partially affected and the housing structures on the land are fully affected. The households will move backward to the remaining unaffected residential land area of the households to rebuild their houses. The remaining unaffected residential land areas of the affected households are still sufficient for the household to rebuild their houses with no variation in size from the affected house. The farming activities of the households are not affected but their other non-land livelihoods would be temporarily impacted during the relocation period (three months). In addition, it is expected that approximately 30 households (93 persons) will experience impacts between 10% and 20% of total production landholding of the household because of the RBP implementation. Apart from land acquisition, land consolidation will also be carried out with five projects under the RBP (Mersin, Burdur, Aydın, Hatay and Bayramhacılı). In Türkiye, DSI is the primary

authority responsible for land consolidation. The process is conducted with the consent of majority of farmers and through informed-decision mechanism. Once a site is designated for land consolidation (with various factors considered such as topography, existing fixed assets, cadastral and ownership status, access roads, and others), the Presidential Decree on land consideration is publicly announced within the region using appropriate local methods so that farmers are adequately informed. During implementation, following the government's regulations (especially Additional Article 9 of Law No. 6200), farmers shall be compensated for any damage to crops or fixed assets and income losses incurred until new plots are delivered. Meaningful consultation with farmers is conducted during pre-parcellation stage and again during the preparation of the draft parcellation plan so that the opinions, suggestions and concerns of farmers are fully addressed before implementation of land consolidation. Through land consolidation, the number of parcels is reduced, parcel shapes are improved, and drainage and irrigation systems and access roads are enhanced. It also reduces the need for land acquisition and supports preventing farmers from being deprived of their land during irrigation modernization. Consultation results during the ESSA show that there are no complaints from farmers who joined land consolidation of other irrigation projects in areas that the RBP is a part of – on the process, and local farmers support land consolidation. DSI has an established, strong, and long-standing institutional practice in land consolidation. Regular contact is maintained with local communities and farmers, and the grievance redress mechanism (GRM) is in-place to settle the relevant issues of farmers during the process. The only one concern identified during the ESSA with land consolidation process under the RBP is that total agricultural land holding of some households would be reduced. Land consolidation typically does not reduce the total landholding size of farmers; rather, it reorganizes scattered, small, and inefficient plots into larger, more manageable, and productive blocks. While consolidating land can sometimes involve using a small portion of land for new infrastructure like roads or drainage, the overall goal is improved efficiency, often facilitating easier, larger-scale, or more profitable farming. However, with some households, due to the availability of land in the consolidation area, the total agricultural land holding of the household would be reduced compared to before being consolidated. To ensure that the process does not negatively impact on the households, DSI and relevant agencies will observe and be compliant with the provisions of relevant national laws and regulations (Law No. 5403 on Soil Protection and Land Use, and others) on minimum agricultural landholding of a household (the threshold for production and sufficient-income agricultural land size). Monitoring of minimum agricultural land size of the households after land consolidation will be conducted as part of the land expropriation and land consolidation monitoring program. Tables 3 and 4 present the scope of land acquisition and land consolidation of sub-projects under the RBP.

Table 3. Summary of Land Acquisition and Consolidation for Irrigation Projects

#	Project	Method		Remarks
		Expropriation	Consolidation	
1	Burdur-Göhlisar Irrigation Rehabilitation	✓	✓	<ul style="list-style-type: none"> About 30 km of alignment outside the consolidation area, covering approximately 950 parcels and 15 ha (150,000 m²), requires land acquisition. Of the 150,000 m² to be acquired, 145,000 m² is private land and 5,000 m² is state-owned land. Indicatively, 470 parcels (≈7 ha) are for expropriation and 480 parcels (≈8 ha) for easements; within the first 5 km, there are 109 parcels totaling 3.6834 ha. For the first 5.0 Km, land consolidation is being carried out with 53% of land-owners.
2	Hatay Amik-Afrin Reyhanlı Dam Irrigation 1 st Section Completion		✓	<ul style="list-style-type: none"> Land acquisition is not required, only land consolidation is needed for this Project. Consolidation has started and progressed to the second public posting phase for the area of approximately 1.876 hectares of land.
3	Aydın Çine Koçarlı Bağarası Irrigation 2 nd Section Completion	✓	✓	<ul style="list-style-type: none"> Approximately 400 parcels and a total of about 300,000 m² (300 dönüm) are planned for land consolidation and easement acquisition (temporary and permanent). Breakdown: <ul style="list-style-type: none"> Expropriation: ~180 parcels totaling ~120,000 m². Acquisition for easements (temporary and permanent): ~220 parcels totaling ~220,000 m². Land consolidation has started with first public posting phase for about 120,000 m²
4	Mersin-Pamukluk Dam Irrigation Completion 2nd Part	✓		<ul style="list-style-type: none"> Land acquisition is required. Total planned: 1106 parcels and approximately 84.163 hectares (841,632 m²). Breakdown: <ul style="list-style-type: none"> Expropriation: 540 parcels totaling 38 ha. Acquisition for easements (temporary and permanent): 566 parcels totaling 46.16 ha.
5	Bayramhacılı Pump Irrigation		✓	<ul style="list-style-type: none"> Land acquisition is not required. Land consolidation process is ongoing: survey and mapping works and the second public posting have been completed.

km = kilometer, m² = square meter.

Table 4 Summary of Land Acquisition and Consolidation for Flood Control Projects

#	Project	Expropriation	Notes
1	Construction of Ordu Fatsa Bolaman Weirs	✓	<ul style="list-style-type: none"> • Total area of 48,700 m²; approximately 113 privately owned parcels, 40,200 m² of forest land, and 1,060 m² belonging to the Treasury. • Sediment control weirs: <ul style="list-style-type: none"> ○ Applications have been submitted to the Giresun and Amasya Regional Directorates of Forestry for the allocation of locations for 10 of the planned sediment control weirs within the scope of the work. ○ The remaining 20 weirs fall on private land; an application has been submitted to the Ordu Metropolitan Municipality to carry out expropriation for these 20 weirs.
2	Çankırı-Merkez Tatlısuyolu (Değim) Stream 1 st Section		<ul style="list-style-type: none"> • No expropriation or land consolidation is required
3	Samsun-Merkez Mert River	✓	<ul style="list-style-type: none"> • Expropriation: An area of 4,367 m², 25 parcels, and 21 structures will be expropriated. Physical displacement is involved for 21 households.
4	Kastamonu Araç District Araç Stream Rehabilitation Part 1	✓	<ul style="list-style-type: none"> • Expropriation is anticipated for a total area of 539,057.33 m² across 415 parcels.
5	Düzce-Merkez Asarsuyu Stream Upper Basin Measures	✓	<ul style="list-style-type: none"> • For the expropriation, a total area of 166,000 m² across 32 parcels.
6	Bartın Amasra Çakraz Village Büyükdere 2 nd Section	✓	<ul style="list-style-type: none"> • The total expropriation area is 301,480 m².

- **Gender Impacts.** The RBP areas of influence encompasses a substantial female population, estimated at approximately 48,278 women. The distribution of the female population in the RBP areas is: Burdur province (13,902), Aydin province (9,361), Nevşehir province (2,233), Hatay province (7,499), and Pamukluk province (15,283). This demographic context underscores the material relevance of gender considerations for the RBP. Across the RBP areas, agricultural production constitutes the primary livelihood, with women playing a critical yet often informal role in farming, irrigation-related labor, and household-based agricultural decision-making. Despite their active engagement, the following factors may prevent local women from benefitting from the RBP and participating in the RBP activities.
 - (a) **Women’s exclusion from consultations related to land acquisition.** Land ownership and formal water user representation are predominantly held by men, limiting women’s formal voice in land acquisition, irrigation planning, and water governance.
 - (b) **Limited awareness among women regarding compensation arrangements and grievance redress mechanism.** Women’s participation in consultation processes tends to be constrained by social norms and limited access to information, particularly during early project preparation stages.
 - (c) **Indirect livelihood impacts on women that remain unrecognized during preparation of compensation program.** Women-managed plots and subsistence production systems are highly sensitive to disruptions in land access and water availability.
 - (d) **Preparation-stage consultations that rely primarily on formal landowners, irrigation associations, or mixed-gender public meetings may systematically underrepresent women.** While compensation processes are legally tied to formal ownership, women—despite being primary users or co-managers of land—may not be formally recognized as affected persons. As a result, gender-differentiated knowledge related to irrigation practices, seasonal water needs, and crop choices may not inform project design.

DSI and relevant agencies recognize that effective projects involve women in planning, providing tailored training (especially gender-sensitive training on modern techniques like motorized pumps and others), ensuring equitable access to resources and technology choices and better involvement in WUAs would lead to empowerment, improved household health and gender equality. However, implementation of the RBP would have some potentially adverse impacts on local women. Irrigation projects often deepen inequalities if designed without considering gender roles, as men usually get favored access to new irrigation technologies. Land acquisition and physical displacement would temporarily affect livelihood activities of local women. Women’s safety and privacy may be affected by the presence of onsite workers coming to the communities.

- **Social Inclusion.** Although the irrigation modernization investments to be designed under the RBP offer a strong technical and institutional framework, there is a risk that poor farming households and other vulnerable groups (including small-scale producers, women farmers, tenants, elderly farmers, and informal producers) may be excluded from RBP benefits if adequate social inclusion analysis is not undertaken at the design stage. These risks are

particularly heightened when beneficiary definitions are based on land ownership, irrigation association membership, or formal registration status, which may result in the exclusion of groups who are actively engaged in agricultural production but remain legally or institutionally invisible. In addition, the high upfront investment requirements and ongoing operation and maintenance costs associated with irrigation modernization also represent a critical design risk from a social inclusion perspective. When cost-sharing and co-financing arrangements are designed without considering household-level affordability, poor farming households may be effectively unable to participate in the RBP. In such cases, exclusion occurs not through formal restrictions but through economic inaccessibility, disproportionately affecting small-scale producers and plots managed by women. Furthermore, in many irrigation associations in Türkiye, decision-making processes are practically dominated by large landholders, while the representation of women and small-scale producers remains limited. Treating these institutional power asymmetries as “neutral” in program design may result in the needs and priorities of vulnerable groups being insufficiently reflected in the planning and implementation of modernization investments.

- **Risks and impacts during construction.** During construction, the social risks and impacts of the RBP include (a) community health and safety risks; (b) labor influx impacts; and (c) restricted access to community spaces.
 - **Community Health and Safety.** The projects supported under the RBP involve extensive construction activities, including excavation, pipeline installation, drainage works, and the use of heavy machinery across large rural areas and in proximity to villages and agricultural lands. During the construction phase, these activities may pose temporary risks to community health and safety, particularly for residents living near construction sites, farmers accessing their land, and vulnerable groups such as children, elderly persons, and persons with limited mobility. The key community health and safety risks are as follows:
 - (a) Physical safety risks from construction activities: Open trenches, excavations, pipeline corridors, and construction sites may present fall and injury risks to community members, particularly in agricultural areas where daily access to fields is required. The use of heavy construction equipment and machinery near settlements and farmlands may further increase the risk of accidents.
 - (b) Traffic and road safety risks: Construction activities are expected to increase truck and heavy vehicle traffic transporting materials and equipment. In rural areas, where local roads are often narrow and shared by pedestrians, agricultural machinery, and animals, increased construction traffic may heighten the risk of traffic accidents, noise disturbance, and dust generation.
 - (c) Impacts related to dust, noise: Earthworks, excavation, and pipe-laying activities may generate dust and noise, which can cause temporary nuisance and health impacts, particularly for sensitive receptors such as children, elderly persons, and individuals with respiratory conditions.
 - (d) Workforce–community interaction: The presence of temporary construction workers in or near small settlements may lead to increased interaction with local communities. While significant risks are not anticipated, there is a potential for

localized concerns related to communicable diseases, social tensions, or perceived safety issues if interactions are not appropriately managed.

- (e) Vector-borne diseases: altering hydrology and conditions may support a range of disease vectors, including mosquitoes, flies, ticks, and rodents. Poorly rehabilitated canals, drains, and vegetation along water infrastructure, combined with increased human–water contact, can elevate exposure and disease transmission risks for nearby communities
- **Labor Influx.** The projects under the RBP are expected to rely predominantly on locally sourced or regionally based labor, with limited requirements for large-scale labor influx. Construction activities are generally linear, dispersed, and time-bound, reducing the likelihood of the establishment of large worker camps or long-term worker presence in small settlements. Nevertheless, the temporary presence of non-local workers in rural communities may create localized and perceived risks, particularly for women, girls, and other vulnerable community members. Potential risks include increased interaction between workers and local populations, cultural misunderstandings, and concerns related to personal safety.
- **Access to Community Space.** The projects supported under the RBP involve linear construction activities, including excavation, pipeline installation, and drainage works, which may temporarily intersect with or pass through areas used by communities for daily movement, agricultural access, and social activities.
 - (a) Temporary restrictions on movement and access: During construction, access to certain community spaces may be temporarily restricted due to excavation works, pipeline installation, and related activities. These restrictions may affect village roads, footpaths, and informal walkways, as well as agricultural access roads used by farmers to reach their fields. In addition, access to shared community facilities such as mosques, cemeteries, schools, and local gathering areas may be intermittently disrupted. Such temporary limitations have the potential to interfere with daily routines and livelihood activities, particularly for households that depend on frequent and timely access to agricultural land.
 - (b) Differential impacts on vulnerable groups: Temporary access constraints may have disproportionate effects on vulnerable and at-risk groups within the community. Women may be more affected where commonly used routes for household and agriculture-related activities are disrupted. Elderly people and individuals with disabilities may face increased safety and mobility challenges when alternative routes are longer, uneven, or poorly maintained. Children may also be affected where construction activities intersect with school routes or commonly used play areas, increasing both inconvenience and safety concerns.
 - (c) Safety risks related to access constraints: Where temporary access restrictions are not adequately managed, there is an increased risk of accidents and injuries. Inadequate signage, insufficient lighting, lack of clearly defined alternative routes, or poorly managed temporary closures may expose community members to hazards, particularly in the vicinity of open trenches, construction machinery, or traffic diversions. Effective access management and clear communication are

therefore essential to minimize safety risks during construction.

- **Operational phase social risks and impacts.** During the operational stage, social risks and impacts include: (a) imbalance in water use; (b) increased energy use and costs; and (c) gender-related risks.
 - **Imbalance in Water Use.** Risk of imbalance in water usage during the operational phase in the context of Türkiye while managing allocation and actual distribution in modernized networks, the gradual implementation of the measurement infrastructure by DSI, pressure and flow imbalances, maintenance-related interruptions, and capacity differences in some WUA units may result in unequal access and unfair distribution of benefits between upstream and downstream sections.
 - **Increased Energy Use and Costs.** In areas where pressurized irrigation systems are operated, increased reliance on electricity or other energy sources may lead to higher recurrent operating costs. While overall productivity gains are expected to offset these costs over time, poor and smallholder farmers may face affordability constraints, particularly in the short to medium term. These impacts highlight the importance of considering poverty and vulnerability dimensions in operation-stage water and energy cost recovery arrangements. Potential social impacts of the RBP would include:
 - (a) Disproportionate financial burden on low-income farmers with limited capacity to absorb higher energy costs.
 - (b) Reduced net income gains for poorer households compared to better-off farmers.
 - (c) Risk that some farmers may limit irrigation use due to cost concerns, thereby not fully benefiting from the modernized system.
 - **Gender-related Risks.** Operational arrangements that do not adequately consider gender roles and participation may limit women’s ability to benefit from improved irrigation services. Potential gender-related risks in operational stages are as below. If unaddressed, these issues may result in women benefiting less from the RBP-supported investments, despite their active role in agricultural production.
 - (a) Limited participation of women in water user organizations and decision-making processes related to water allocation and system management.
 - (b) Irrigation schedules or operational practices that do not reflect women’s agricultural responsibilities and time constraints.
 - (c) Reduced access for women farmers to information, training, or GRMs related to system operation.

3. Assessment of Borrower's ES Management Systems

AIIB's ESP and the RBF Interim Guidance Note set out core principles and elements that provide a systematic guide to assess the Borrower's systems and their capacity to plan and implement effective measures for ES risk management. The core principles and elements serve as a basis for the provision of AIIB's implementation support through the RBP lifecycle.

The scope of the ES systems assessment depends on the RBP's context, sector, and the scope of the RBP activities. This section describes the Borrower's ES systems to manage all identified ES effects, especially risks and adverse impacts. This section describes the main elements of applicable Borrower systems and provides an analysis of the acceptability of these systems, considering the level of risk and the extent to which Borrower systems and practices are aligned with core principles and elements outlined in AIIB's ESP and the RBF Interim Guidance Note.

The detailed comparison of Borrower systems against core principles and core elements is included as an annex to the ESSA Report, while the main text of the report summarizes AIIB's findings with regard to the adequacy and effectiveness of the Borrower's applicable ES systems to address the identified ES effects of the RBP.

3.1. Policy and Legal Framework for Managing the ES Effects of the RBP

3.1.1. Description of the applicable ES policy and legal framework

This part presents a review of applicable policies to the RBP. This included Acts, Rules, Policies, Schemes, etc. on land, citizen engagement, livelihood, inclusion, gender, labor, pollution control, resource conservation, waste management.

Environmental Law No. 2872 (1983). The purpose of Law No. 2872 is to ensure the protection of the environment, which is a common asset of all living beings, in accordance with the principles of sustainable environment and sustainable development. This Law outlines the structure for environmental regulations, penalties for violations, and administrative procedures. It encompasses general rules and prohibitions for environmental protection and provisions for creating an environmental fund. Law No. 2872 specifies the fundamental principles for environmental protection, restoration, and pollution prevention. Among these principles are the polluter pays principle, sustainable development, community participation rights, efficient resource and energy use, waste minimization at the source, recycling, and combating climate change. In line with Law No. 2872, several regulations have been published since 1983. Most of them have been revised to harmonize with the European Union Directives as part of Türkiye's pre-accession efforts.

Regulation on Environmental Impact Assessment (29.07.2022 Official Gazette No: 31907).

This regulation establishes the technical and administrative procedures to be followed during the EIA process. The regulation categorizes projects into two annexes based on their potential environmental impacts. Projects listed in Annex-1 are required to prepare a full-scale EIA Report. Projects listed in Annex-2 must submit a Project Presentation File, which serves as a screening

and preliminary assessment of their environmental impacts. Both the EIA Report and the Project Presentation File include the Environmental and Social Management Plan (ESMP), as well as other relevant plans (such as zero waste plan, traffic management plan, environmental monitoring plan, etc.). However, the formats of these plans are provided by the Ministry of Environment, Urbanization and Climate Change (MoEUCC).

According to the EIA Regulation, the MoEUCC monitors, verifies and audits whether the commitments set out in the Final EIA Report -which forms the basis for the “EIA Positive” decision- or in the Project Presentation File-which forms the basis for the “EIA Not Required” decision-have been fulfilled for the relevant projects. The Ministry checks the accuracy of the works and procedures stated in the project progress reports. While performing these duties, the Ministry cooperates with relevant institutions/organizations when deemed necessary. For projects granted an “EIA Positive” decision, the project owner is obliged to have the project progress report—containing developments recorded in the investment at intervals determined by the EIA commission—prepared by institutions/organizations authorized by the Ministry and that did not take part in preparing the EIA report for the said project, upload it to the electronic system, and present it during Ministry inspections.

Even when exempt from the EIA Regulation, all activities must comply with other relevant ES legislation in force. This includes the requirement the project to prepare relevant site-specific plans, such as Occupational Risk Assessment, Health and Safety Plan, Emergency Response Plan, and Waste Management Plan. The MoEUCC, along with its provincial directorates, is the main authority responsible for conducting environmental inspections to ensure that activities are carried out in accordance with the environmental legislation.

As for the relevance of the requirements to the RBP:

- Annex-1 includes: (a) open-pit mining operations planned on an area of 25 ha or more (including excavation and dumping areas), and (b) facilities that perform at least one of the following processes - crushing, screening, washing, drying, and ore preparation, with a capacity of 400,000 tons/year or more.
- Annex-2 includes: (a) water management projects for agricultural purposes (1,000 ha and above), (b) projects involving the regulation of riverbeds with continuous flow over a length of 5 km or more, (c) ready-mixed concrete plants with a production capacity of 100 m³/hour or more, (d) facilities with a production capacity of 5 tons per hour or more that produce shaped materials using cement or other binding agents, (e) extraction of minerals (those not included in the Annex-1 list), and (f) facilities that carry out at least one of the processes of crushing, screening, washing, drying, and ore preparation.

The EIA status of sub-projects together with their implementation status are provided in

Table 5. Out of 11 sub-projects:

- Six flood sub-projects are exempt from EIA Regulation, (neither in Annex-1 nor in Annex-2 [are not projects involving the regulation of riverbeds with continuous flow over a length of 5 km or more]).

- One irrigation sub-project, having been assessed as an integrated project together with a dam project, has been granted with an “EIA Positive Decision” (Annex-1).
- Two sub-projects are exempt from EIA Regulation due to being planned and approved before 1993 (enactment of national EIA Regulation).
- One irrigation sub-project is exempt from EIA Regulation as it is due to a rehabilitation project.
- One irrigation project has an “EIA is not required” decision being assessed as Annex-2 projects (water management projects for agricultural purposes [1,000 ha and above]).

Table 5. River Basins, EIA and Implementation Status of Sub-projects

No	Sub-projects and Type	Basin	EIA Status	Implementation Status	Physical Progress %
1	Burdur-Golhisar Irrigation Rehabilitation (<i>Rehabilitation</i>)	West Mediterranean	Exempt from EIA Regulation	Construction stage (contract awarded on June 22, 2023)	52
2	Hatay Amik-Afrin Reyhanli Dam Irrigation 1st Section Completion (<i>New Irrigation</i>)	Asi	The sub-project is exempt from EIA Regulation because it was planned before 1993. However, an "EIA Positive Decision" has been issued for the material borrow areas.	Construction stage (contract awarded on May 16, 2024)	27
3	Aydın Çine Koçarlı Bağarası Irrigation 2nd Section Completion (<i>New Irrigation</i>)	Buyuk Menderes	The sub-project is exempt from EIA Regulation because it was planned before 1993.	Construction stage (contract awarded on Nov. 6, 2025)	0
4	Mersin-Pamukluk Dam Irrigation Completion 2nd Part (<i>New Irrigation</i>)	East Mediterranean	The sub-project is listed in Annex-1 of EIA Regulation, and an "EIA Positive Decision" has been issued together with the related dam and regulator.	Construction stage (contract awarded on May 12, 2023)	57
5	Bayramhacılı Pump Irrigation (<i>New Irrigation</i>)	Kizilirmak	The sub-project is listed in Annex-2 of EIA Regulation, and an "EIA Not Required Decision" has been issued.	Bidding stage	0
6	Construction of Ordu Fatsa Bolaman Weirs (<i>Flood Control</i>)	Yesilirmak	Exempt from EIA Regulation	Construction stage (contract awarded on June 14, 2024)	0
7	Çankırı-Merkez Tatlisuyolu (Degim) Stream 1st Section (<i>Flood Control</i>)	Kizilirmak	Exempt from EIA Regulation	Construction stage (contract awarded on June 10, 2024)	7
8	Samsun-Merkez Mert River (<i>Flood Control</i>)	Yesilirmak	Exempt from EIA Regulation	Construction stage (contract awarded on Jan. 11, 2024)	40
9	Kastamonu Arac District Arac Stream Rehabilitation Part 1 (<i>Flood Control</i>)	West Black Sea	Exempt from EIA Regulation	Construction stage (contract awarded on March 28, 2024)	18
10	Duzce-Merkez Asarsuyu Stream Upper Basin Measures (<i>Flood Control</i>)	West Black Sea	Exempt from EIA Regulation	Construction stage (contract awarded on Dec. 29, 2023)	55
11	Bartın Amasra Cakraz Village Büyükdere 2nd	West Black Sea	Exempt from EIA Regulation	Construction stage	80

	Section <i>(Flood Control)</i>			(contract awarded on Nov. 5, 2024)	
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Regulation on Environmental Permit and License (10.09.2014 Official Gazette No: 29115).

This regulation outlines the procedures for obtaining environmental permits and licenses as required by the Environmental Law. Environmental permits address key issues such as air emissions, environmental noise, deep sea discharge, and hazardous waste disposal. Activities with the highest potential for environmental pollution (listed in Annex 1) must obtain an environmental permit from the MoEUCC. Activities with lower pollution potential (listed in Annex 2) are required to obtain permits from the relevant Provincial Directorates. Irrigation and flood control projects are exempt from the Environmental Permit. However, if wastewater is generated during construction, a connection permit to an existing sewer system or a discharge-related environmental permit is required. Additionally, auxiliary facilities used during construction -such as quarries, borrow pits, crushing and screening plants, and concrete batching plants- may be subject to environmental permitting requirements depending on their operational capacities.

Occupational Health and Safety Law No: 6331 (2012). In recent years, Türkiye has undergone a reform to improve its national OHS system through adapting a set of international and regional standards into its national level requirements for the prevention occupational risks as defined in the International Labor Organization (ILO) OHS Convention, 1981 (No. 155). The convention, along with the Occupational Health Services Convention, 1985 (No. 161) was ratified by Türkiye in 2005. Türkiye has also been a party to the Labor Inspection Convention((No. 81) since 1951. In 2014, Türkiye ratified the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187). In 2012, a stand-alone Law on OHS was put into force. The purpose of the OHS Law is to regulate the duties, authority, responsibilities, rights, and obligations of employers and employees to ensure OHS in workplaces and to improve existing health and safety conditions. This Law encompasses all workplaces and employees, including civil servants, private sector workers, and self-employed individuals, regardless of the number of employees or the type of work. The primary goal of the Law is to prevent occupational diseases, accidents, and other work-related physical and mental health issues. There are specific regulations detailing the implementation of the requirements listed in the Law.

Labor Code Law No. 4857 (2003). The Labor Code provides protections to workers in line with international requirements. The law prohibits people under the age of 18 years from working in hazardous occupations. The minimum working age is 15 years. Türkiye's Constitution under Article 18 prohibits harmful or exploitative forms of labor. Türkiye has also ratified core ILO conventions including prohibiting harmful or exploitative forms of labor and working conditions. The Code includes provisions on minimum wage and sets maximum weekly hours as 45 hours, not exceeding 11 hours daily. The annual limit for overtime work is 270 hours; overtime hours are paid 1.5 times the normal hourly rate, or 1.25 times for part-time employees. Employees may choose to receive 1.5 times the amount of overtime work as time off in lieu of financial compensation for overtime. Workers are entitled to one paid rest day per week. The law mandates paid holiday and leave, including paid maternity leave. There are provisions that prohibit discrimination in employment based on language, race, sex, political opinion, philosophical belief, and religion. Employment may not be terminated on the grounds of race, color, sex, marital status, family responsibilities, pregnancy, birth, religion and political opinion. The Code also includes provisions to ensure that contracted workers are paid.

Expropriation Law No. 2942 (1983, as amended). The Expropriation Law regulates acquisition of immovable property for public interest purposes, in line with the Constitution and international standards. The law requires a formal public interest decision prior to expropriation. It provides that expropriation may only occur with “fair and advance compensation,” based on market value determined through valuation commissions, considering factors such as property location, land type, and comparable sales. The law allows a negotiated settlement as the first step; if negotiations fail, the administration must seek a court decision to finalize compensation. Property owners have the right to a judicial review of valuation and legality of the expropriation.

The law includes provisions for urgent expropriation. In cases where the implementation of the National Defense Obligations Law No. 3634 requires an urgent decision for national defense needs, as determined by the President, or in extraordinary situations stipulated by special laws, expropriation of immovable properties may proceed with only the valuation process postponed. Upon the request of the relevant administration, the court may order the urgent seizure of the immovable property within seven days, based on the valuation determined by experts selected in accordance with Article 15 and in line with the principles of Article 10. This value shall be deposited by the administration, on behalf of the property owner, into the bank specified in the notice and announcement issued pursuant to Article 10, and the immovable property may then be taken into possession. The land registry office shall be notified of the court’s decision permitting seizure of the immovable property. A restriction preventing the transfer, conveyance, or assignment of the immovable property shall be annotated in the land registry. Following the seizure decision, the immovable property shall be vacated in accordance with Article 20. In expropriations carried out under the circumstances described in paragraph 2 of Article 3 of this Law, the amount to be deposited shall be the value of the first installment to be paid.

The law also covers easement rights, partial expropriation, and return of unused land to previous owners if no public benefit materializes. Law No. 2942 prohibits deprivation of property without compensation and provides procedural safeguards and appeal mechanisms to protect owners’ rights. Amendments and related legislation (including Law No. 4650) strengthened negotiation procedures, valuation transparency, and judicial oversight.

Soil Conservation and Land Use Law No. 5403. Land consolidation is regulated primarily under Articles 17 and 17/A. The purpose of land consolidation under Law No. 4503 is to increase agricultural production, reduce land fragmentation, support irrigation projects, and ensure the efficient use of agricultural lands. Consolidation involves reallocating scattered parcels belonging to the same person or enterprise into larger and more rationally usable parcels. In accordance with Law No. 4503, the land consolidation area is announced, parceling plans are prepared, a public disclosure (announcement and consultations) period is provided, and affected parties have the right to submit objections. Disputes related to land consolidation can be brought before administrative courts. Land consolidation activities include agricultural infrastructure services and are based on the principle of “equal value”, meaning landowners must be allocated land of equal quality, productivity, and value. Law No. 4503 governs the construction of roads, canals, drainage systems, irrigation infrastructure, and on-farm development works within consolidation projects.

Except for lands subject to expropriation, land transfer and allocation procedures are carried out while safeguarding property rights. Once a majority of landowners agree, the land consolidation decision becomes binding for all landholders.

Regulation on Land Consolidation and On-Farm Development Services (Official Gazette: 23.03.2014, No. 28949). The Regulation defines the steps, including project announcement, cadastral updates, boundary and ownership determinations, land grading, preparation of allocation plans, public disclosure (notice) period, objections, in-village planning, and final registration. Commissions such as the land grading commission, parceling plan commission, and acceptance commissions carry out these tasks. Landowners retain the right to submit objections and seek judicial review (Articles 25–33 of the Regulation). Within the consolidation project area, portions of land needed for infrastructure (such as roads, canals, drainage, and irrigation structures) may be allocated for public use; where equivalent land cannot be offered, land exchange or expropriation may be applied (Law Article 17/A; Regulation Article 15). After completion of consolidation, the final parcel plan is registered in the land registry and the results are publicly disclosed by the implementing authority. If pastures, seasonal grazing areas, cultural heritage sites, or protected zones exist within the project area, relevant legislation is applied to protect these areas. DSI is authorized as the implementing agency for land consolidation and field development services. Institutions and organizations other than DSI are authorized to carry out land consolidation and field development services as project managers, subject to DSI's permission.

Law on the Protection of Cultural and Natural Assets (No. 2863). Türkiye's Law No. 2863 provides the legal framework for the identification, registration, conservation, and management of cultural and natural heritage assets. The Law requires that any works in areas containing or potentially containing cultural and natural assets obtain prior approval from the Ministry of Culture and Tourism and the Regional Conservation Boards. Construction, excavation, or land-use changes affecting designated sites are subject to heritage protection procedures, including chance-find protocols requiring immediate suspension of works and notification of authorities. Unauthorized alteration, removal, or damage to protected assets is prohibited and subject to penalties. Public agencies and project implementers are required to comply with conservation measures and ensure that heritage resources are safeguarded during project planning and implementation.

Law on the Right to Information (No. 4982, 2003). Law No. 4982 guarantees individuals' and legal entities' right to access information from public institutions and organizations, enhancing transparency and accountability in public administration. The law obliges public bodies to respond to information requests within specified timeframes, except for information classified for national security, privacy, commercial confidentiality, or state secrets. Citizens may appeal rejected requests to the Right to Information Review Board, ensuring an administrative review mechanism for transparency and fairness. Public institutions must establish procedures and designated units for receiving and processing information requests.

Law on the Right to Petition (No. 3071, 1984). Law No. 3071 grants all citizens of Türkiye and

resident foreigners the right to submit written petitions to competent public authorities regarding requests, complaints, and grievances. Public institutions are required to review and respond to petitions within legal time limits and provide written justification for decisions. The law ensures that petitions are formally registered and processed, and petitioners are informed of the outcome. It strengthens citizen participation and accountability in public administration by providing an accessible grievance avenue at national and local levels.

Dam Safety. Water for the irrigation projects is supplied by existing and operational dams. With regard to dam safety, DSI implements comprehensive dam safety measures across the project lifecycle, from design through operation and rehabilitation. It participates in final dam project design and conducts dam failure and collapse analyses, preparing and approving flood hazard maps and emergency action plans, shared with the Disaster and Emergency Management Authority (AFAD), with systematic integration of failure analyses since 2015. For operating dams lacking plans, DSI prepares collapse analyses and emergency action plans, and performs site visits to resolve construction issues. It reviews and controls inspection reports after earthquakes of magnitude 5 and greater, and semiannual inspection reports by Dam Safety Commissions in regional directorates, classifying all dams' risk levels per the International Commission on Large Dams (ICOLD) criteria. Instrumentation-based monitoring is rigorous: accelerometers are installed and monitored online 24/7 by AFAD's Earthquake Directorate; readings from dam devices are evaluated to monitor behavior, with reporting every 15 days during construction, weekly during initial impoundment, and monthly during operation under its Circular 2020/1. DSI also evaluates instrument reports before authorizing front-face concrete pouring in concrete-faced dams, checks dam safety files, prepares and approves rehabilitation projects, and issues Special Technical Specifications on dam safety. The RBP will not include any new dam or rehabilitation of existing dams.

Türkiye is also party and signatory to several international and regional treaties, agreements and conventions for ES safeguards. These encompass environmental, biodiversity, archeology, cultural heritage, gender and labor-related issues. Türkiye's legal framework therefore provides procedural and substantive protections that align with international principles on labor rights, grievance redress, and community protections.

Overall, Türkiye's policy and legal framework is adequate to support ES management under the RBP. When combined with screening procedures that exclude high-risk activities, the framework ensures that RBP interventions remain moderate-risk, reversible, and manageable through established national systems and standard implementation measures.

3.1.2. Assessment of Applicable ES Policy and Legal Framework vis-a-vis Core Principles for RBF

The table below provides an assessment of the applicable ES policy and legal framework including ESMS against the seven core principles. Annex 4 includes a set of indicative guiding questions and checklists for each of the core principles and core elements.

Table 6. Comparison of Applicable E&S System Against the Core Principles of AIB's RBF Policy

Main Applicable Legislation	Assessment against the Core Principles	Gaps
Core Principle 1: Promote environmental and social sustainability in the RBP's design		
Environmental Law EIA Regulation	<p>Relevant ES legislation, laws and regulations support promoting ES sustainability in the RBP. These are listed in Annex 2 and summarized in Section 3.1.1. The strategic objectives of the RBP include the sustainable use of soil and water resources to enhance adaptation to climate change impacts and to improve the climate-resilience of flood-prone areas.</p> <p>While the legal framework for ES assessment is comprehensive, most sub-projects within the scope of the RBP are exempt from the EIA Regulation and therefore do not require EIA. Nonetheless, even when exempt from the EIA Regulation, all sub-projects must comply with other relevant ES legislation in force.</p> <p>Overall, the regulatory framework is considered sufficient to address ES risks and impacts under the RBP. No critical adjustments or additional measures to the regulatory framework are required prior to the commencement of the RBP.</p>	<p>While the ES legislation is adequate, DSI needs to demonstrate that its activities comply with the relevant provisions of the legislation, particularly during the construction phase of sub-projects, to promote ES sustainability.</p>
Core Principle 2: Avoid, minimize or mitigate adverse impacts and promote informed decision-making relating to the RBP's environmental and social impacts		
Environmental Law EIA Regulation	<p>The national EIA Regulation establishes a general framework for environmental management in Türkiye, specifically for building or development projects that exceed a certain capacity threshold. The most recent amendment to the EIA Regulation broadens its scope to include social aspects, such as social assessment and requirements to prepare stakeholder engagement plans for Annex 1 projects. The regulation is consistent with the main principles of the European Union (EU) and good international practice, aiming to promote sustainable development and public participation in decision-making. The EIA Regulation requires screening, scoping, avoidance, minimization, and mitigation of adverse ES impacts of proposed activities, as well as compensating for residual impacts. However, most sub-projects within the scope of RBP are exempt from the EIA Regulation and therefore do not require EIA.</p> <p>Construction material for sub-projects are either supplied from quarries and facilities that have completed their obligations under the provisions of the EIA Regulation and Environmental Permit and License Regulations or such facilities (i.e., quarries, borrow pits, crushing and screening facilities, concrete plants, etc.) are established by the Contractor, as a part of the sub-project, in line with</p>	<p>ES responsibilities for avoiding and mitigating impacts are distributed among different departments of DSI designated ES focal points are needed to coordinate efforts and ensure that all ES issues and RBP-related actions are properly managed.</p> <p>Since most of the sub-projects are exempt from EIA Regulation and construction works are ongoing at most sites, the ES monitoring and supervision function of DSI for construction activities needs to be strengthened to demonstrate compliance with ES legislation (enhanced on-site ES monitoring and supervision of construction works is required).</p>

Main Applicable Legislation	Assessment against the Core Principles	Gaps
	<p>the requirements of environmental legislation, even if the sub-project itself is exempt from the EIA Regulation. Moreover, even when exempt from the EIA Regulation, all sub-projects must comply with other relevant ES legislation in force. The MoEUCC, along with its provincial directorates, is the main authority responsible for conducting environmental inspections to ensure that activities are carried out in accordance with environmental legislation.</p> <p>The ES framework is being applied in World Bank-financed projects, even those are exempt from EIA Regulation, and DSI has begun developing its own Institutional Environmental and Social Management System, particularly for internationally funded projects.</p> <p>The proposed sub-projects under the RBP have been screened, and the RBP does not include any high ES risk sub-projects or activities listed under the ESEL.</p> <p>Additionally, the latest Water Basin Master Plans were prepared by DSI for all basins in Türkiye between 2013 and 2016. These plans consider water balance, baseline water quality, and other relevant environmental considerations in basin water management to avoid and mitigate adverse impacts. The master plans are scheduled to be updated and will be subject to the Strategic Environmental Assessment Regulation.*</p> <p>DSI is responsible for the management of ES aspects of its sub-projects and is adequately resourced and staffed-in terms of skills, qualifications, and number of staff, to ensure effective administration, planning, design, implementation, and monitoring functions. However, the ES monitoring and supervision function of DSI, particularly during the construction phase of sub-projects, where contractors are contractually responsible for implementing relevant environmental legislation, needs to be strengthened to demonstrate compliance with environmental legislation.</p>	
<p>Core Principle 3: Avoid, minimize, or mitigate adverse impacts on natural habitats and cultural resources resulting from the RBP</p>		
<p>Environmental Law EIA Regulation Law on</p>	<p>Sub-projects with potential significant adverse impacts on natural habitats, and/or biodiversity or physical cultural resources are ineligible for the RBP. Consequently, sub-projects that would result in significant adverse impacts on protected areas or biodiversity areas, as defined by national law, or on natural habitats and cultural resources are not eligible for financing under the RBF and</p>	<p>No gaps identified.</p>

Main Applicable Legislation	Assessment against the Core Principles	Gaps
<p>Conservation of Cultural and Natural Assets</p> <p>Laws and regulations indirectly relevant to the RBP (such as Regulation of Protection of Wetlands, Regulation on Wildlife Preservation and Wildlife Development Areas, etc.)</p>	<p>have been excluded from the RBP.</p> <p>ESMS in Türkiye recognize the importance of protecting natural habitats and physical cultural resources. Project activities are governed by the EIA Regulation, as well as laws and regulations related to biodiversity, the preservation of protected areas, and cultural heritage protection. Adequate safeguards are in place to ensure the conservation of biodiversity and physical cultural resources, and to protect natural habitats and physical cultural resources from development activities.</p> <p>Activities located in cultural or natural protected areas must obtain approval from relevant authorities. These approvals are either secured through the EIA process or by consulting relevant authorities to ensure the protection and conservation of such areas, and to avoid impacts on cultural and natural resources-even if sub-projects are exempt from EIA Regulation. With support of DSI, the ESSA has screened the locations of the sub-projects and identified that irrigation sub-projects are sited mainly on agricultural lands classified as modified habitats, and flood sub-projects are located within urban areas, with some along seasonal creeks in rural settlements. Sub-project sites are also not sited within recognized physical cultural areas. Therefore, no significant adverse impacts on natural habitats and/or biodiversity are expected due to sub-project activities.</p> <p>Furthermore, procedures to be followed if previously unknown physical cultural resources are discovered (chance finds) are explained in the relevant law.</p>	
<p>Core Principle 4: Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the RBP; (ii) exposure to toxic chemicals, hazardous wastes and other dangerous materials under the RBP; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</p>		
<p>OHS Law</p> <p>Labor Code</p> <p>Environmental Law</p> <p>Regulations related to OHS</p>	<p>The sub-projects include construction activities that may pose public and worker safety risks. Public and worker safety is a critical priority in Türkiye, with safety standards guided by Türkiye’s robust legal framework, including the OHS Law and its respective regulations, as well as sector-specific safety guidelines.</p> <p>These regulations aim to ensure the safe design, construction, operation, and maintenance of projects, while addressing risks associated with hazardous materials, disaster-prone areas, and worker welfare.</p> <p>National regulations on labor and OHS are aligned with good international</p>	<p>Since construction works are ongoing at most sites, the OHS monitoring and supervision function of DSI for construction activities needs to be strengthened to demonstrate compliance with OHS legislation (enhanced on-site OHS monitoring and supervision of construction works is required).</p> <p>Since construction works are ongoing at most sites, the ES monitoring and supervision function of DSI for construction activities needs to be strengthened to ensure strict compliance</p>

Main Applicable Legislation	Assessment against the Core Principles	Gaps
<p>Environmental regulations regarding waste management</p> <p>Regulations related pesticides and chemical fertilizers</p>	<p>practice. The Ministry of Labor and Social Security is the primary authority overseeing labor and OHS issues, and labor inspectors from the Ministry inspect the facilities and activities in this regard. DSI contractually requires its contractors to comply with national laws, including those on labor and OHS. Moreover, DSI recently disclosed an Internal Occupational Health and Safety Directive (September 2024), which clearly states that “Contractors and subcontractors working for the institution (i.e. DSI) carry out their work in accordance with OHS legislation. Although all responsibility lies with the contractor as per the contract, inspections are also carried out by the control/supervision organization and occupational safety experts (of DSI).” However, DSI’s monitoring and supervision function for construction works in this respect needs to be strengthened on site to ensure compliance with relevant legislation.</p> <p>Türkiye has sufficient and well-developed environmental legislation and related facilities to ensure the use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials. This framework is largely harmonized with EU directives and international conventions, and is supported by a range of regulations, institutional arrangements, and operational practices. The regulatory system covers all stages of hazardous material management—production, storage, transport, use, and disposal—and is supported by institutional capacity, monitoring, and enforcement mechanisms. While implementation and enforcement can always be strengthened, the legal and institutional framework is robust and meets the requirements for safe and environmentally sound management of hazardous materials. Hazardous waste generated should be transported by licensed transportation companies and disposed of at licensed facilities in line with the relevant regulations.</p> <p>Sub-projects are not intended to promote the use of chemical fertilizers or pesticides. However, due to increased agricultural crop production, there may be a corresponding rise in the use of pesticides or agrochemicals. Türkiye has made significant progress in adopting and promoting Integrated Pest Management (IPM) practices, particularly in response to both national priorities and international commitments (such as EU harmonization and the Rotterdam Convention**). The MoAF is the primary authority overseeing pest management, including the regulation, monitoring, and enforcement of pesticide</p>	<p>with ES legislation (enhanced on-site ES monitoring and supervision of construction works is required).</p>

Main Applicable Legislation	Assessment against the Core Principles	Gaps
	<p>use and the promotion of IPM. Therefore, Türkiye has established strict regulations on pesticide registration, use, and residue limits, in line with EU and international standards. The use of banned or unauthorized pesticides is monitored, and there are penalties for violations. Additionally, relevant World Bank-financed projects in Türkiye include components specifically aimed at strengthening IPM research, training, and implementation. These projects support the dissemination of IPM practices, capacity building for extension staff and farmers, and the development of pest management plans as part of ES management frameworks.</p>	
<p>Core Principle 5: Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at a minimum restoring, their livelihoods and living standards</p>		
<p>Expropriation Law</p> <p>Soil Conservation and Land Use Law</p> <p>Regulation on Land Consolidation and On-Farm Development Services</p> <p>Settlement Law</p>	<p>Within the scope of projects under RBP, risks related to land acquisition/land consolidation are involved. Land consolidation is prioritized as the primary mechanism and expropriation applied only where consolidation is not feasible or sufficient. Land consolidation practices reduce parcel fragmentation, rely on land-for-land reallocation of equal value and quality, and include public notification, objection mechanisms, administrative review, and judicial recourse. These features support avoidance and minimization of displacement and continuity of agricultural livelihoods.</p> <p>Where expropriation is required, Türkiye's Expropriation Law (Law No. 2942) establishes clear procedures for land acquisition in the public interest, including land and asset valuation, negotiation, compensation payment, and access to administrative and judicial appeals. The system emphasizes negotiation prior to court-based expropriation, and evidence from ongoing sub-projects indicates that negotiated settlements are actively pursued. Judicial processes are available where agreement cannot be reached, ensuring due process and protection against unlawful deprivation of property.</p> <p>While national legislation bases compensation on market value rather than explicit full replacement cost, DSI applies good international practice measures in internationally financed projects to ensure that compensation paid in practice is sufficient to meet replacement cost requirements. Compensation is paid immediately in cash if an agreement is reached with the property owner on the price. If no agreement is reached, payment is made according to the outcome of the lawsuit filed by the Administration. Landowners retain the right to appeal valuations through the courts.</p>	<p>DSI's capacity for systematic monitoring and supervision of land acquisition and compensation processes needs to be strengthened to ensure consistent application of compensation <i>at full replacement cost and adequate protection of the rights and livelihoods of affected households, including informal and secondary users.</i></p> <p>Since land acquisition and compensation measures alone may not ensure full restoration of livelihoods for severely affected and vulnerable households, including secondary and informal users, there is a gap in having a clearly defined and operational mechanism to trigger the preparation and implementation of a Livelihood Restoration Program (LRP). Strengthened capacity is required to systematically assess livelihood outcomes and to initiate an LRP or equivalent additional support measures in cases where affected households' livelihoods are not adequately restored.</p>

Main Applicable Legislation	Assessment against the Core Principles	Gaps
	<p>The legal framework primarily addresses formally recognized land rights; however, existing legislation and DSI's Real Estate and Expropriation Directive provide a procedure to identify and compensate informal land users (<i>zilyetler</i>) under defined conditions, particularly for crops, trees, and structures on public or treasury land. This approach partially addresses the Core Principle 5 requirement to recognize non-title holders, although eligibility remains conditional and case specific.</p> <p>Land acquisition approaches vary by sub-project and location, reflecting context-specific application rather than a uniform approach, which is consistent with risk-based program implementation. In irrigation modernization projects, impacts typically involve small portions of agricultural parcels for linear infrastructure, limiting the scale of physical and economic displacement in most cases.</p> <p>Under Türkiye's legal framework, land acquisition processes governed by the Expropriation Law No. 2942 provide compensation limited to the assessed value of land and attached assets and do not include additional social support measures, such as livelihood restoration assistance or transitional support. In contrast, where land acquisition results in physical displacement, affected households fall under the scope of Settlement Law No. 5543 including allocation of serviced plots, provision of housing or housing construction support, basic infrastructure, and housing through long-term credit or on-lending arrangements. Accordingly, additional social support is encouraged only in cases of physical displacement and is not an inherent component of land acquisition compensation under the expropriation framework.</p> <p>Overall, the RBP's legal framework, institutional capacity, reliance on land consolidation and negotiated settlements, and provision of judicial recourse provide a sound basis for managing land acquisition impacts. Residual risks relate primarily to the timeliness of compensation in court-based expropriation cases, the treatment of informal and vulnerable land users, and the absence of explicit livelihood restoration requirements beyond compensation, which warrant continued monitoring during implementation.</p>	

Main Applicable Legislation	Assessment against the Core Principles	Gaps
Core Principle 6: Give due consideration to the cultural appropriateness of and equitable access to RBP benefits, giving special attention to the rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups		
<p>Constitution of the Republic of Türkiye</p> <p>Law on Social Services</p> <p>Right to Information</p> <p>Right to Petition Law</p> <p>Environmental Impact Assessment Regulation (public participation provisions)</p>	<p>The applicable legal and institutional framework under the Program demonstrates partial to substantial alignment, which requires that program benefits are socially inclusive, culturally appropriate, accessible on an equitable basis, and responsive to the needs and concerns of vulnerable groups.</p> <p>The Program covers a geographically diverse set of eleven sub-projects across Türkiye, including irrigation rehabilitation, new irrigation investments, and flood control infrastructure in multiple regions. The Program's irrigation and flood control investments have the potential to generate positive distributional impacts, particularly for poor and vulnerable populations in agriculturally dependent and flood-prone areas. Irrigation modernization can improve water reliability and reduce production risks for small-scale farmers, while flood control investments reduce exposure to recurrent disasters that disproportionately affect low-income households, elderly residents, and those with limited adaptive capacity.</p> <p>Türkiye's legal framework provides a strong normative basis for social inclusion, anchored in constitutional equality principles and supported by sectoral legislation. Article 10 of the Constitution establishes equality before the law and explicitly allows affirmative measures for women, children, persons with disabilities, and the elderly. The Social Services Law (Law No. 2828) defines institutional responsibilities for providing protection, care, and assistance to vulnerable groups, thereby supporting equal access to public services and social protection mechanisms. These provisions collectively support the Core Principle 6 requirements related to non-discrimination, equal access, and culturally appropriate service delivery.</p> <p>At the institutional level, DSI maintains established stakeholder engagement practices, including local-level information meetings, ongoing communication with communities, and responsiveness to local concerns. Legal instruments such as the Right to Information and the Right to Petition further enable citizens to raise concerns and seek redress, contributing to procedural accessibility. However, in practice, access to Program benefits; particularly in irrigation schemes; remains closely linked to formal land ownership and irrigation association membership, which may limit effective inclusion of tenant farmers, sharecroppers, informal land users, and women farmers. Financial requirements</p>	<p>While Türkiye's legal framework prohibits discrimination and supports vulnerable individuals, it does not explicitly require proactive targeting or monitoring of equitable benefit distribution for groups such as women farmers, land-poor households, informal land users, seasonal agricultural workers, migrants, or persons with disabilities. Therefore, the ES monitoring and supervision function of DSI for construction activities needs to be strengthened.</p> <p>While the existence of grievance mechanisms is recognized, there is no inclusive, structured, traceable, and program-level integrated GRM in place.</p>

Main Applicable Legislation	Assessment against the Core Principles	Gaps
	<p>related to cost-sharing, operation, and maintenance may further constrain participation by poor and small-scale producers. While these groups are not legally excluded, their participation may be limited by structural and institutional barriers rather than explicit regulatory restrictions.</p> <p>With respect to vulnerable groups, the legal framework provides general protections but does not require systematic identification, targeted engagement, or differentiated support measures within sector investments. Vulnerable groups such as women farmers, smallholders, elderly farmers, informal land users, and low-literacy populations may therefore remain underrepresented in planning, decision-making, and monitoring processes unless proactively addressed through project-level measures.</p> <p>Overall, the system provides a solid legal foundation for equal treatment and social protection, but alignment with Core Principle 6 relies heavily on general equality principles and institutional practice rather than explicit, systematic mechanisms to identify, engage, and address the differentiated needs and concerns of vulnerable groups during program implementation.</p>	
Core Principle 7: Avoid exacerbating social conflict		
Not applicable		

* The purpose of the Strategic Environmental Assessment Regulation (08.04.2017 Official Gazette No: 30032) is to set out the administrative and technical procedures and principles to be followed in the strategic environmental assessment process, which is implemented to integrate environmental considerations into the preparation and approval process of plans/programs that are expected to have significant effects on the environment, in line with the principle of sustainable development, in order to ensure environmental protection.

** Türkiye has ratified both the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade, and the Stockholm Convention on Persistent Organic Pollutants (POPs).

3.2. Assessment of Institutional Capacity for Addressing ES Effects

3.2.1 Description of Existing ES Institutional Setup

DSI's organizational structure consists of three main tiers:

- (a) **Top Management:** The central headquarters of DSI is located in Ankara and constitutes the highest level of institutional governance. The General Director and Deputy Directors are responsible for strategic decision-making, policy formulation, and overall management of organizational activities nationwide.
 - (1) **Central Organization:** The central administration comprises various Departmental Directorates and equivalent units. These entities function as strategic, advisory, supervisory, core service, and auxiliary service bodies, ensuring effective policy development, coordination, and oversight.
- (b) **Regional Directorates:** DSI operates 26 Regional Directorates, structured primarily based on river basins across Türkiye. These directorates act as operational command units, implementing all DSI functions within their respective jurisdictions, including water supply, irrigation, flood control, hydropower development, and groundwater management. In addition to the permanent regional units, DSI also establishes temporary project-based regional directorates for large-scale strategic water development initiatives.
- (c) **Sub-Provincial Units:** Branch Directorates and Chief Engineering Offices: Under each Regional Directorate, Branch Directorates and independent Chief Engineering Offices operate to execute DSI projects within smaller geographical areas or integrated project zones. These units are directly responsible for local implementation, maintenance, technical control, and project administration.

DSI's regional directorates and local offices are tasked with operationalizing ES management on the ground. They ensure compliance with national ES regulations, oversee stakeholder engagement, and monitor project impacts.

As the RBP's implementing agency, DSI will ensure compliance with national ES legislation, as well as international standards applicable to program-financed operations.

Unlike traditional project-based implementation units, DSI does not intend to establish a stand-alone Project Management Unit (PMU) for the RBP. Instead, the Department of Foreign Relations will serve as the central coordination focal point to facilitate dialogue among the relevant technical departments. The Irrigation Department will oversee the irrigation modernization component, while the Flood Control Department will be responsible for the flood risk management component. This integrated approach reflects DSI's institutional maturity and its long-standing experience in managing complex, multi-sectoral infrastructure programs.

Organizational Structure for Environmental, Social and Occupational Health and Safety Management

ES/OHS functions within DSI are embedded into its permanent departmental structure rather than

managed through a temporary project unit. This approach promotes institutional continuity and strengthens long-term capacity retention across all program phases.

At the headquarters level, ES and OHS responsibilities are distributed among three core departments. The Department of Real Estate and Expropriation manages land acquisition, resettlement, and compensation processes in accordance with Türkiye's legislation and, if applicable, international land acquisition and resettlement policy. The Investigation, Planning and Allocation Department, through its Environment Branch Office, is responsible for environmental screening, permitting, monitoring, and compliance oversight. Meanwhile, the Support Services Department, through its OHS Branch Office, manages workplace health and safety systems, risk prevention, and emergency preparedness.

The Regional Directorates of DSI constitute a projection of the organizational structure of the General Directorate at the regional level. In terms of duties, authorities, and responsibilities, the Regional Directorates operate within a framework similar to that of the main service, advisory, and auxiliary units of the General Directorate. Accordingly, they represent the regional reflection of the General Directorate's organizational structure.

The current number of personnel in these three departments is shown in Table 7.

Table 7. DSI Departments Responsible for ES and OHS Management

Department	Core Responsibilities	Approximate Staff Number
Department of Real Estate and Expropriation	Land acquisition, resettlement, compensation	600 (50 HQ; ~20 per region)
Investigation, Planning and Allocation Department / Environment Branch Office	Environmental assessment, monitoring, permitting	20 HQ; 75 regional
Support Services Department / OHS Branch Office	OHS management, audits, emergency training	23 HQ; 165 regional OHS staff (Additional 6 OHS specialists are being hired externally.)

In addition to in-house expertise, DSI supplements its OHS functions through contractual arrangements with accredited occupational safety and health service providers (OSGBs). Two of the 26 regional offices receive partial OHS support through such service agreements, ensuring continuity of coverage and compliance with national labor and safety regulations. Moreover, DSI also recruits environmental consultancy firms for the preparation of ES assessment documents as needed.

DSI has been implementing several projects with MDBs such as the World Bank since early 1990s including the Irrigation Rehabilitation Project, Drainage and On Farm Development Project, Privatization of Irrigation Project, Türkiye Irrigation Modernization Project (first and second), Türkiye Resilient Landscape Integration Project and Türkiye Water Circularity and Efficiency Improvement Project. Through the implementation of these MDB projects as well as its own

projects, DSI has developed a strong ES management capacity. It has dedicated ES specialists at headquarters and regional directorates (including provincial and district levels, as appropriate). Moreover, DSI has started developing its own Institutional ESMS (I-ESMS) and plans to establish the system by 2027. This system will include ES policies, detailed risk management procedures and adequate human resources aligned with the international ES standards.

Capacity Building and Training Systems

DSI has established an institutionalized framework for capacity building and professional development, integrating continuous learning into its operational culture. Training programs are organized regularly to enhance technical proficiency and regulatory compliance across ES and OHS domains.

The Department of Real Estate and Expropriation conducts “Expropriation Seminars” every two years within in-service trainings, addressing key topics such as land valuation, resettlement procedures, and stakeholder engagement. These are complemented by annual coordination meetings where regional representatives discuss operational performance, legislative updates, and financial needs. The department also collaborates with academic institutions and judicial experts to provide case-based learning opportunities.

The Environment Branch Office within the Investigation, Planning and Allocation Department organizes in-service training sessions every two years. These sessions focus on environmental assessment methodologies, monitoring techniques, and compliance requirements. External experts from universities, consultancy firms, and the MoEUCC can participate in these programs, ensuring alignment with national and international best practices, if necessary.

The OHS Branch Office maintains a regular three-year training cycle focused on OHS regulations, emergency preparedness, and first aid response. These activities are conducted in partnership with the Ministry of Labor and Social Security and the Provincial Health Directorates. Trainings are delivered in DSI’s own facilities and are designed to ensure the consistent application of safety procedures across all project sites.

Moreover, internationally financed projects provide staff responsible for ES and OHS matters with opportunities to participate in specialized training programs and workshops. These trainings and workshops are designed to familiarize them with international standards and best practices, such as those outlined in the World Bank Environmental and Social Framework (ESF). Through these capacity-building activities, ES and OHS staff enhance their knowledge and skills, enabling them to effectively implement and monitor project activities in accordance with global requirements. This approach not only improves the quality and safety of project outcomes but also ensures compliance with donor expectations and international regulations.

3.2.2 Assessment of the Adequacy of Institutional Resources

DSI possesses a well-established institutional framework and sufficient technical expertise to

manage ES and OHS risks under the RBP. The organization benefits from clear departmental mandates, and a distributed staffing model that supports both central oversight and regional implementation. The presence of dedicated ES and OHS staff across multiple administrative levels demonstrates institutional maturity and depth.

The existing institutional organization and division of labor within DSI are deemed adequate to meet the ES objectives of the RBP. The long-standing operational experience of DSI in managing large-scale water infrastructure projects further strengthens institutional effectiveness and minimizes the risk of overlap or fragmentation in E&S responsibilities. Overall, the organizational framework is considered sufficient to deliver consistent and coherent E&S performance across national and regional levels.

DSI's institutional capacity for ES and OHS management is robust, supported by a well-distributed workforce, defined roles, and adequate financial resources. The presence of qualified ES and OHS both at headquarters and regional offices ensures that ES responsibilities can be effectively implemented. The annual operational budget allocates dedicated resources for environmental monitoring, stakeholder engagement, compensation, and safety management. Regular in-service training programs and workshops reinforce technical competencies, legislative compliance, and cross-departmental coordination. Overall, DSI demonstrates sufficient institutional capacity and resource adequacy to meet the operational demands and performance targets of the RBP.

DSI's implementation practices are directly relevant to the ES management requirements of the RBP. The agency has long-standing experience in executing large-scale water infrastructure projects that involve environmental assessment and permitting, land acquisition, and community engagement. Its internal procedures are aligned with national regulations and have been successfully adapted to international standards in previous externally financed projects. The presence of established systems for environmental assessment, OHS compliance, and grievance management reinforces the credibility and applicability of DSI's institutional practices to the RBP context. Therefore, DSI's implementation experience provides a solid operational foundation for ES risk management and monitoring.

Despite the overall adequacy of DSI's institutional framework, several ongoing challenges remain that could affect the full effectiveness of E&S management. These include uneven documentation and monitoring practices across regional offices, limited integration of gender and social inclusion considerations into project planning, and the absence of a unified digital system for tracking E&S performance data. In certain cases, coordination among departments could be strengthened to improve information flow and reporting consistency. While these issues do not undermine the overall functionality of DSI's E&S management system, they highlight areas requiring continuous improvement to ensure harmonized performance and compliance across all regions.

DSI has demonstrated strong commitment to enhancing institutional systems for ES and OHS management. DSI is currently working, with the support of the World Bank, on the establishment of an I-ESMS aimed at strengthening the agency's internal governance and operational capacity for ES risk management. Once operationalized, this system will serve as an integrated framework

applicable to all internationally financed projects implemented by DSI, incorporating both national legal requirements and international ES standards. Ongoing initiatives demonstrate that DSI seeks to institutionalize sustainable ES management practices, ensure compliance with international good practices, and further align its operational procedures with the IFI's ES standards. This ongoing effort reflects the Borrower's proactive approach and long-term commitment to addressing identified capacity gaps and achieving continuous institutional improvement.

Overall, DSI's institutional capacity is assessed as adequate and functional, with potential for further strengthening through targeted capacity-building investments during the RBP implementation period.

Management of ES risks and impacts of the in line with the agreed ES actions in the RBP Action Plan (AP) are sufficient to manage the identified ES risks and impacts as well as to strengthen the capacity of ES assessment and management of DSI.

3.2.3 Management of Environmental Effects of RBP

DSI has demonstrated strong institutional performance in managing environmental impacts across irrigation and flood control projects. As the principal water resources authority in Türkiye, DSI has decades of experience in planning, financing, and delivering large-scale hydraulic infrastructure. DSI has worked with the World Bank since 1979 and continues to manage multiple internationally financed investment projects, which has contributed to the development of systematic environmental assessment and risk management practices within the institution.

Institutionally, DSI maintains dedicated environmental units at both the General Directorate and regional levels. These units are responsible for environmental screening, assessment, permitting, and supervision, and have extensive experience implementing national environmental legislation. Since DSI implements its own investment projects, it routinely applies Environmental Law No. 2872 and its respective regulations, the EIA Regulation as well as sectoral permitting requirements. Additionally, DSI holds a formal role in Türkiye's national EIA process, serving as one of the commission members in the review and evaluation of EIA reports. This long-standing participation reflects DSI's deep expertise in environmental impact assessment, scoping, and mitigation planning.

DSI prepares Basin Master Plans through a comprehensive, data-driven and integrated planning process that forms the strategic foundation for sustainable water resources management at the basin scale. The process includes detailed assessment of hydrological, hydrogeological and socio-economic conditions; analysis of water potential, demand projections and water balance; identification and evaluation of project alternatives such as irrigation modernization, storage structures, hydropower options and environmental flow requirements; and prioritization of investments based on technical, economic and environmental criteria considering cumulative impacts as well. The plans are developed in close coordination with national and local institutions and through basin-level stakeholder consultations. Following ministerial approval, the plans guide

DSI's long-term investment strategy and are periodically updated based on monitoring results and evolving climate and development conditions. This planning framework provides a robust basis for ensuring that the RBP is implemented within a well-established system for managing environmental effects at the basin level. Updates to the Basin Master Plans will inform the water resources management and decision making for future investments. As a result of the updated plans, an adaptive management approach at the basin level will be applied to address emerging risks and impacts and the need for additional measures.

Across its nationwide portfolio, DSI ensures that its projects secure all necessary environmental and sectoral permits, including cultural heritage approvals, pastureland clearance, forest permits, and coordination with biodiversity protected area authorities where relevant. This demonstrates its institutional ability to navigate Türkiye's complex environmental and land use permitting system and coordinate with multiple government agencies to ensure compliance.

In terms of biodiversity management, DSI incorporates ecological constraints into basin planning and project design, ensuring that sensitive habitats, migratory routes, and protected areas are considered during site selection and alternative analysis. Activities under the RBP, comprising irrigation network rehabilitation and flood control infrastructure, are therefore implemented within a framework that aims to minimize ecological disturbance and impacts.

DSI has also taken steps to strengthen its OHS and Community Health and Safety (CHS) practices. An OHS unit operates at the General Directorate level, and a recent directive has been issued to clarify procedures for incident reporting and management, particularly in projects financed by international development partners. These measures support safer construction practices and enhance transparency in incident tracking and response. Additionally, DSI disclosed an Internal OHS Directive (September 2024) to define the duties, authorities, responsibilities, rights, and obligations of employers and employees. The directive aims to ensure OHS and improve existing health and safety conditions within the central and regional/provincial organizations of DSI.

Overall, DSI's historical performance shows that environmental regulations are consistently applied and that environmentally beneficial outcomes, such as reduced water losses, improved climate resilience, and enhanced ecological consideration through basin planning, are being achieved. The institution's long-standing experience with hydraulic infrastructure, strong technical capacity, and emerging system enhancements provide a solid foundation for effective environmental management under the RBP.

3.2.4 Management of Social Effects of RBP

DSI has good practice experience in managing social impacts, particularly in land acquisition, land consolidation, gender equality, and OHS. Experience gained through projects financed by development partners, including the World Bank, has led to the gradual systematization of social safeguards implementation and monitoring practices.

As analyzed above, land acquisition and gender impacts are the main social issues of the RBP. The existing and relevant laws and regulations of the government, as well as the current practices of DSI on land acquisition, are assessed adequate to manage the risk. Compensation that sufficiently covers the full replacement cost of affected land and assets will be paid to the affected households. For physically displaced households, additional assistance and allowances will be provided in addition to cash compensation, including moving allowance, initial settlement allowance, transitional assistance, and livelihood restoration measures. The physical displacement process will be managed by the Samsun Metropolitan Municipality. Economically displaced households will also be entitled to livelihood restoration measures apart from cash compensation for the affected land area of the household. DSI will establish a Valuation Commission to appraise the value of affected lands and assets and determine the compensation due to affected households.¹⁰ Land Expropriation Plans will be prepared for the projects under the RBP following the government's existing and relevant laws and regulations. The GRM is in-place to settle complaints/grievances of the affected households effectively and in a timely manner. To manage the risks of land acquisition under the RBP, as specified in the agreed ES Action Plan, DSI will conduct regular, separate monitoring on land acquisition and resettlement. If any households who face difficulties in restoring their livelihoods, an additional livelihood restoration program will be developed by DSI in consultations with the affected households for implementation to assist the households to restore the livelihoods to the level as before being affected. A land acquisition and resettlement monitoring checklist will be prepared by DSI with support of the project team for use by DSI during its monitoring.

DSI has an established, strong, and long-standing institutional practice in land consolidation. Regular contact is maintained with local communities and farmers, and the GRM is in-place to settle the relevant issues of farmers during the process. Under the RBP, separate and regular monitoring will be conducted by DSI following the agreed land acquisition and resettlement monitoring checklist so that all the opinions, suggestions and concerns of farmers on land consolidation process are settled satisfactorily and recorded systematically.

DSI has implemented several initiatives to promote gender equality and enhance the participation of women in irrigation management. Following capacity-building programs conducted under the earlier TIMP-1 project, training sessions were held to raise awareness among staff and stakeholders on women's inclusion in meetings and WUAs. These initiatives have contributed to improved engagement with disadvantaged/vulnerable groups, particularly women farmers. Field observations and follow-up assessments show that women's participation in irrigation-related decision-making and income-generating activities has increased, particularly in western regions where agricultural production is more profitable. These results indicate that gender awareness training and local-level outreach have produced positive social outcomes and strengthened social inclusion in DSI's programs.

¹⁰ The Commission collects information on recent transactions in the area, uses the information of relevant institutions and organizations, including information from local real estate offices and chambers of commerce and industry. If any affected persons are not satisfied with the proposed compensation unit rate determined by the Valuation Commission, they have the right to take the matter to court. In such cases, the court usually recommends forming an independent commission to conduct a fresh valuation for the decision of the court.

Under the RBP, comprehensive gender assessment will be conducted by DSI for all 11 sub-projects under RBP focusing on (a) potential gender impacts (positive, negative, direct, indirect, permanent, temporary) by the RBP; (b) benefits of the RBP to local women (long-term, short-term); (c) obstacles for participation of local women in the RBP (planning, design of projects, implementation, monitoring, etc.); and (d) challenges related to gender equity and gender mainstreaming with DSI managed irrigation and flood control projects. Following the assessment and public consultations, a Gender Action Plan will be prepared for the RBP with practical and feasible measures to support (a) mitigative measures are identified and implemented to manage the advert gender impacts by the RBP; (b) beneficial measures are developed to bring about and promote positive impacts and benefits of the RBP to local women; (c) adequate measures and plan are established to facilitate participation of local women in the Business Resource Planning; and (d) other gender equity and gender mainstreaming actions are agreed by relevant agencies for implementation. Under the RBP, a DLI has also been included in the RBP design to support women receiving benefits from new climate-resilient irrigation services (DLI 4).

DSI has long-standing experience managing labor-related issues through compliance with national labor legislation, contractor oversight, and internal OHS protocols. Past MDB-financed operations demonstrate that DSI requires contractors to adhere to OHS Law No. 6331 and implement site-specific OHS measures, including worker training, use of PPE, safe work procedures, and incident reporting. Although OHS performance varies across regional directorates depending on capacity and contractor practices, DSI has generally maintained acceptable labor standards.

Most DSI projects are characterized by small- to medium-scale civil works that generally rely on locally or regionally sourced labor, thereby presenting a low risk of significant labor influx. DSI has required contractors to adhere to national regulations governing worker registration, accommodation standards, and codes of conduct. This will be continued under the RBP.

DSI has routinely carried out stakeholder engagement in previous irrigation and basin-level planning projects, mainly through coordination with provincial administrations, water user organizations, local municipalities, and farmer groups. Engagement activities typically include information dissemination, public meetings, and technical workshops.

Another good practice relates to supporting vulnerable farmers, particularly elderly individuals who face difficulties using the mobile irrigation application. In such cases, the Irrigation Union is authorized to access the application on behalf of the farmer, ensuring that irrigation orders and adjustments can still be made in a timely and efficient manner. This arrangement provides an important accessibility measure for vulnerable groups, prevents exclusion from digital service delivery, and helps maintain equitable access to irrigation operations across all user segments.

DSI has procedures for screening construction sites for possible cultural heritage risks and coordinates with the Ministry of Culture and Tourism when potential assets are identified. Past projects indicate compliance with national heritage protection legislation, and construction works

have been adapted when chance finds or registered cultural sites were encountered.

DSI manages grievances primarily through national mechanisms such as CIMER and YIMER, supported by project-level GRMs when needed. Headquarters systematically logs CIMER grievances and coordinates with regional offices for resolution. However, regional GRM practices are not centralized, resulting in variability in record-keeping, response times, and data integration. Despite these inconsistencies, DSI has shown the ability to address community concerns in past programs, particularly those related to construction impacts, land acquisition, and service disruptions. The RBP provides an opportunity to establish a more standardized, accessible, and gender-sensitive GM system across all regions. DSI has established a Worker's Grievance Mechanism that operates exclusively at the General Directorate level, enabling employees to report OHS concerns. The corporate OHS portal, managed centrally by the General Directorate, serves as the primary channel through which workers can submit grievances related to workplace incidents, unsafe conditions, and near-miss events. The system allows employees to file complaints confidentially, while management can record, track, and address submissions to ensure appropriate corrective actions. Although this mechanism is limited to the General Directorate, it is considered a good practice that enhances transparency, supports early identification of workplace risks, and contributes to fostering a more proactive safety culture within DSI's operations.

4. Stakeholder Engagement and Grievance Redress

4.1. Stakeholder Engagement during ESSA preparation

To develop a better understanding of the ES systems applicable to irrigation and flood control sectors, and to validate institutional practices under the RBP, the Project Team conducted site visits and consultations during the ESSA preparation phase. On Oct. 8-10, 2025, the team visited key/sample project sites in Adana and Mersin provinces, including irrigation schemes supplied by dams, and rehabilitation areas. The itinerary included:

- Pamukluk Dam and Irrigation Project,
- Efrenk Stream Rehabilitation Area, and
- Seyhan Regulator Automation Application Company.

The visits were complemented by meetings with:

- DSI 6th Regional Directorate staff,
- contractors and technical teams involved in irrigation automation systems, and
- WUAs, *mukhtars*, and farmers, to understand local perspectives on irrigation practices and challenges.

These consultations focused on:

- current ES systems and their application in irrigation and flood control projects,
- lessons learned from ongoing programs financed by DSI,
- potential ES risks and impacts of proposed RBP activities, and
- institutional capacity and areas for strengthening ES management.

The consultations intend to inform the stakeholders about the RBP, for timely disclosure of relevant information, minimizing misinformation, and seeking feedback on the RBP. All information related to the RBP will be disseminated in a culturally appropriate and accessible manner to ensure inclusivity and transparency. Special attention will be given to vulnerable groups, such as women farmers, seasonal workers, and smallholder households, to guarantee their participation and feedback. Public disclosure will be carried out through multiple channels, including the DSI official website, regional notice boards, and local governance platforms (*mukhtar's* office), ensuring that stakeholders receive timely and accurate information.

The insights gathered during the consultation informed key ESSA findings and contributed to shaping ES actions and measures under the RBP. A summary of site visits and stakeholder consultations is provided in Annex 3. Project Team responded to queries during the consultation, which were mostly related to the scope of the RBP, activities considered under Program and process involved in addressing potential ES impacts, raised by the RBP stakeholders during the consultations held while preparing the ESSA (Annex 3).

4.2. ESSA Disclosure and Consultation

The executive summary of the ESSA will be translated in Turkish and both the ESSA, and the

Executive Summary will be disclosed by DSI and AIIB on their website.

4.3. Grievance Redress Mechanism

4.3.1. Grievance Channels

DSI has a robust system that comprises of multiple modes for registration of grievances, such as DSI central telephone line, an online GRM portal for public and employee use, the Presidential Communication Center (CİMER), the Foreigners Communication Center (YİMER), and sub-project-specific GRMs for ongoing projects financed by international funding agencies.

Table 8. Grievance Submission Channels

Grievance Submission Channels	
Postal Address	Mustafa Kemal Mah. Anadolu Blvd. No:9, PK: 06530 Çankaya / ANKARA
Phone	+90 312 454 54 54
KEP (secure e-mail)	dsi.gnlmud@hs01.kep.tr
CİMER	cimer.gov.tr
YİMER	yimer.gov.tr

DSI's GRM prioritizes the resolution of stakeholder and beneficiary submissions at the lowest operational level, typically branch directorates, while preserving the right to access higher authorities at any stage. In practice, most grievances are addressed locally, indicating that the system functions as a flexible, multi-channel mechanism rather than a mandatory escalation pathway. This design ensures accessibility, responsiveness, and efficiency, allowing complaints to be resolved promptly while maintaining the option for escalation through regional directorates, the General Directorate, and ultimately national platforms such as CİMER.

4.3.2. Grievance Procedure

Grievance Submission

Grievance may be submitted in writing or verbally. In practice, written submissions are prioritized; however, verbal grievances are formally recorded and converted into written format by DSI staff to ensure documentation and traceability.

Stakeholders may lodge grievances through several entry points, including:

- directly at DSI provincial or district (Şube) offices,
- through contractors and field-level implementation partners, such as irrigation unions,
- directly to DSI Regional Directorates or DSI Headquarters, and
- through the national CİMER system (Presidency Communication Center), which provides a formal external channel and remains accessible at all stages.

This structure enhances accessibility by offering both formal institutional entry points and community-level contact mechanisms.

Review of Grievances

- **DSI Provincial or District (Şube) Office Level:** Grievances submitted locally are first reviewed by the relevant DSI Provincial Office, where they are logged and examined. Field-based supervision teams carry out site visits and verification, as required. A significant portion of grievances are resolved at this stage through local administrative action, clarification, or site-based intervention. This reflects the institution's focus on resolving concerns as close to the source as possible.
- **DSI Regional Directorate Level:** Where local resolution is not feasible, or where cases require more advanced technical assessment, grievances are elevated to the relevant DSI Regional Directorate. Regional offices coordinate with technical departments and administrative units to review the issue, conduct additional field checks if needed, and provide a formal response to the complainant.
- **DSI General Directorate Level:** In cases where resolution is not achieved at regional level, grievances may be forwarded to DSI Headquarters for final institutional consideration. Headquarters reviews the case through the relevant departments and issues a formal response.
 - (a) **DSI Portal:** The DSI Portal functions as an internal mechanism through which employees of the General Directorate may submit complaints and requests, including those of an urgent nature. According to information provided by DSI, a total of 220 submissions were made through this system over the past year. It was reported that a substantial proportion of these submissions have been resolved and closed.
- **National Level:** Complainants retain the right to engage CİMER at any point in the process, including as a direct first step. CİMER functions as a formal state-level oversight mechanism, ensuring an external route for escalation and regulatory accountability. YİMER is the official call center in Türkiye where foreigners can submit requests for information, support, and complaints. As of 1 January 2024, it provides live voice support in five languages — Turkish, English, Arabic, Russian, and Persian — on weekdays between 08:00 and 18:00.

In accordance with national administrative procedures, all grievance submissions must receive a formal response within 30 calendar days under the Law on the Exercise of the Right to Petition. For information requests under the Right to Information Law, the maximum response time is 15 working days. Where resolution requires additional time, an interim response shall be provided within the statutory period.

For projects financed by international financial institutions, DSI applies a project-specific GRM designed to complement national administrative channels and ensure compliance with international ES safeguards.

4.3.3. Gap and Recommendations

Interviews conducted with DSI representatives and villagers indicate that grievances raised by project-affected people and other stakeholders are generally addressed through existing administrative channels at the branch (*şube*), regional, and headquarters levels. While the

approach prioritizes prompt resolution at the local level, it operates in a largely informal and decentralized manner. The mechanism is flexible and allows complainants to approach higher authorities, including CIMER, at any stage. However, the absence of a formalized, consistently applied system across regions and project sites creates risks in terms of documentation, transparency, monitoring, and learning.

Table 9 provides a consolidated overview of the grievance mechanism assessment, summarizing key findings, highlighting structural and operational gaps, and outlining recommended corrective actions to enhance system efficiency, accessibility, and compliance.

Table 9. Gap Analysis for Grievance Redress Mechanism

Finding	Gap	Recommendation
Provincial or District (<i>Şube</i>) Office often resolve verbal grievances promptly and informally.	Limited systematic recording monitoring of complaints	Introduce a standard digital logging system at branch/regional level, including for grievances resolved immediately
Grievances may be submitted verbally and converted to written format	Limitation of formal documentation standards and reporting templates	Adopt standardized forms, logging rules, and routine reporting requirements
A grievance mechanism has not been established at the basin level within the scope of the RBP.	Insufficient structured communication and complaint channel at the basin level	Communication channels will be agreed between the Regional Directorates of DSI and <i>mukhtars</i> (village leaders) at the basin level to facilitate information exchange and grievance handling.
There is currently no dedicated mechanism in place to address Sexual Exploitation and Abuse /Sexual Harassment (SEA/SH) allegations within the existing grievance procedures.	The system does not include safe, confidential, survivor-centered reporting channels, protocols, or referral pathways for SEA/SH cases; there are also no specific requirements for contractors.	Integrate a SEA/SH protocol into the Worker's GRM; establish a dedicated and confidential SEA/SH reporting channel; define survivor-centered support and referral pathways (including psychosocial and legal support); deliver SEA/SH awareness and reporting training for all personnel and contractor workers; ensure visible information and reporting access at project sites.

4.3.4. The Project Affected People's Mechanism

AIIB's Policy on the Project-affected People's Mechanism (PPM) applies to this RBP. The PPM has been established by AIIB to provide an opportunity for an independent and impartial review of submissions from Project-affected People who believe they have been or are likely to be adversely affected by AIIB's failure to implement the ESP in situations when their concerns cannot be addressed satisfactorily through the GRM or the processes of AIIB's Management.

5. Recommendations and Actions

5.1. Conclusions of the ESSA

The ESSA concludes that the Program's ES classification is Category B as the key ES risks and impacts are considered to be medium, site-specific, temporary, reversible, and predictable, which can be effectively mitigated with standard construction practices and compliance with national environmental regulations. Category A and other higher-risk activities which are likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or social were excluded from the RBP. The legal and policy framework including the ESMS were found to be adequate; however, there remain certain gaps from the perspective of actual implementation of such systems identified through this ESSA.

The assessment identified the following key areas that require further strengthening:

- (a) Coordination between DSI and relevant agencies on ES aspects of the RBP.
- (b) ES and OHS monitoring, supervision and reporting function of DSI.
- (c) Improvement of the grievance mechanism to ensure that it is culturally appropriate and not only affected people by the projects under the RBP but also local people and concerned agencies in the seven basins can also lodge the issues, if any, and the issues are resolved and responded in a timely manner;
- (d) Reinforcing land acquisition and land consolidation oversight through the preparation of a standardized monitoring template, routine monitoring of land acquisition and consolidation progress, providing compensation by replacement cost, and providing compensation and assistance for the informal land users, if any.
- (e) Conducting gender assessment, and preparing, implementing, and monitoring a Gender Action Plan to strengthen women's participation and engagement, minimize and manage of gender impacts by the RBP, support providing gender benefits from the RBP implementation, as well as to facilitate gender equality and gender mainstreaming by the RBP.

The ESSA recommendations have been incorporated in the RBP AP including the specific details in respect to institutional responsibilities, timelines, and indicators for the completion of actions. The ES actions have been discussed and agreed by DSI and relevant agencies.

5.2. ES Actions in the RBP AP

This subsection includes a summary of the actions and measures which DSI is required to take during implementation to improve the ES systems performance of the RBP.

Table 10. Agreed ES Actions and Measures

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
1.	<ul style="list-style-type: none"> ES responsibilities are distributed among different departments of General Directorate (GD) of DSI. Designated ES focal points are needed to coordinate efforts and ensure that all ES risks and impacts of the RBP are properly managed. 	<ul style="list-style-type: none"> GD of DSI will assign and maintain ES focal points for the RBP (one for environment, one for social and one for OHS) who will coordinate and be responsible to address ES and OHS issues and actions. 	DSI	<ul style="list-style-type: none"> Prior to Loan Effectiveness 	<ul style="list-style-type: none"> ES focal points assigned by GD of DSI (one for environment, one for social and one for OHS). 	Action Plan
2.	<ul style="list-style-type: none"> Since most of the sub-projects are exempt from EIA Regulation and construction works are ongoing at all sites, the ES, OHS, and CHS monitoring and supervision function of DSI for construction activities needs to be strengthened to ensure strict compliance with ES and OHS legislation (Enhanced on-site ES and OHS monitoring and supervision of construction works is required). 	<ul style="list-style-type: none"> GD of DSI will prepare environmental, health and safety monitoring checklist and monthly ES monitoring report format to be used for the RBP. 	DSI	<ul style="list-style-type: none"> Within one month from loan effectiveness 	<ul style="list-style-type: none"> The environmental, health and safety monitoring checklist and the monthly ES monitoring report format prepared by GD of DSI and approved by the AIIB. 	Action Plan
		<ul style="list-style-type: none"> GD of DSI (through its regional directorates) will regularly monitor and supervise construction activities to ensure that contractors strictly comply with relevant ES, OHS, and CHS legislation, including at least monthly ES and OHS site visits. The Regional Directorates of DSI will submit monthly reports to GD of DSI. This will include completion audit of each sub-project at the end of construction activities. 	DSI	<ul style="list-style-type: none"> Within one month from loan effective and throughout the construction phase of sub-projects 	<ul style="list-style-type: none"> Respective Regional Directorates of DSI prepared monthly ES monitoring reports and submitted to the GD of DSI. 	Action Plan
		<ul style="list-style-type: none"> GD of DSI will adopt ES monitoring and reporting system for RBP. 	DSI	<ul style="list-style-type: none"> Year 1 onwards 	<ul style="list-style-type: none"> GD of DSI prepared and submitted ES compliance reports to 	Action Plan

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
3.	<p>Redress Mechanism: In-line with national legislation, DSI shall respond to written grievances submission of petitions via physical or digital platforms within 15 days. The grievance redress mechanism shall be strengthened to ensure that verbal complaints or requests are recorded and responded to in a timely manner.</p> <p>Roles of village leaders in the GRM will be strengthened in sending the issues to DSI Regional Directorate and monitoring implementation of measures to manage the advert impacts of the RBP.</p>	<ul style="list-style-type: none"> The General Directorate of DSI will instruct Regional Directorates and contractors to record all verbal grievances received. These records will be included in monthly reports prepared during monitoring activities under Action 2. Communication channel will be agreed between the Regional Directorate of DSI with the village leaders of the RBP area and also in the seven basins. Simple guidance will be provided by the Regional Directorate of DSI to the village leaders. Village leaders can send complaints related to the RBP to the Regional Directorate of DSI and monitor the implementation of measures to manage advert impacts of the RBP. 	DSI	<ul style="list-style-type: none"> Throughout the project 	<p>the AIIB biannually.</p> <ul style="list-style-type: none"> Inform the Regional Directorate and Contractor. Number of grievances of project affected persons reported and resolved within stipulated time. Communication channel will be agreed between the Regional Directorate of DSI with the village leaders of the RBP area and also in the seven basins. Guidance on reporting complaints and monitoring the implementation of measures to manage advert impacts of the RBP will be provided to the village leaders. 	Action Plan
4.	<ul style="list-style-type: none"> Payment of compensation sufficient to cover the cost of replacement for affected land and structures ; protect rights and compensation for the losses of affected informal users, ensure income and livelihoods restored by severely affected households, vulnerable affected households, including informal users. 	<ul style="list-style-type: none"> DSI is to continue applying its internal legislation and practices paying compensation sufficiently to cover full replacement cost for affected lands and assets, and protect rights and compensation for the losses of affected informal users. GD of DSI will prepare land acquisition checklist format, including also the indicators of 	DSI	<ul style="list-style-type: none"> Within one month from loan effectiveness and during the RBP implementation 	<ul style="list-style-type: none"> The land acquisition monitoring report template prepared by DSI and approved by the AIIB. Biannually land acquisition monitoring report prepared by the DSI submitted to the AIIB. 	Action Plan

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
		<p>compensation by replacement cost, protect rights and compensate for losses of informal users, and livelihood restoration of severely affected households and vulnerable affected households by the RBP, including informal users.</p> <ul style="list-style-type: none"> • GD of DSI (through its regional directorates) will monitor regularly land acquisition progress including compensation payment unit rate, compensation for informal users, and livelihood impacts of severely affected households and vulnerable affected households, including informal/secondary users. • DSI will assess impacts on severely affected households, vulnerable affected households, including secondary/informal users; if needed (livelihoods of the households are not restored), prepare and implement additional support measures or a Livelihood Restoration Program (LRP) for the households. 				
5.	<ul style="list-style-type: none"> • Although there is legislation in Türkiye that protects women's rights, differences in implementation, invisible barriers, and cultural and structural factors can limit the actual protection of women. To ensure that women and girls are not adversely affected by 	<ul style="list-style-type: none"> • Assessment will be conducted to identify the gender impacts of RBP during preparation, implementation and operation of the RBP. • Based on the assessment and consultation, measures to manage the identified impacts; measures to ensure local females can 	DSI	<ul style="list-style-type: none"> • Within three months from loan effectiveness 	<ul style="list-style-type: none"> • A gender assessment is conducted and a Gender Action Plan is prepared for implementation. • The agreed Gender Action Plan is implemented and monitored (Monitoring is 	Action Plan

No	Issues to Strengthen	ES Actions	Institutional Responsibilities	Timing	Completion Indicators	Action Type (DLI-DLR/AP)
	<p>activities under the RBP, local females can participate in the RBP activities, gender benefits brought about by the RBP, and to facilitate gender equality and gender empowerment, gender-related parameters will be assessed and a Gender Action Plan will be prepared for implementation for the RBP.</p>	<p>participate in the RBP's activities; and measures to ensure women are benefited from the RBP's activities will be prepared. In addition, measures to promote gender equality and gender empowerment will also be explored.</p> <ul style="list-style-type: none"> • A Gender Action Plan will be prepared for implementation (with the gender measures, institutional arrangements for implementation and monitoring, budget, time-schedule of implementation and monitoring, monitoring indicators, and reporting mechanism). 			<p>integrated in Action 2).</p>	

5.3. **RBP Implementation Support and Monitoring**

5.3.1. **The Client's Role**

DSI is responsible for implementing the RBP, monitoring implementation progress, evaluating the indicators, and performing relevant commitments as per the legal documents, including the RBP AP. DSI's responsibilities as the RBP's implementing agency involves keeping the ESMS effective, implementing monitoring plans, and identifying and solving problems in a timely and effective manner. During the RBP implementation, DSI needs to fulfill the following obligations:

- Implement the agreed ES actions as per the RBP AP and maintain the ESMS and implementation capacity as recommended by the ESSA.
- Submit semi-annual progress reports on the RBP AP implementation to prove continuous compliance with the applicable ES management mechanism.
- Monitor, evaluate, and audit system performance regularly, if necessary.
- Conduct periodic meaningful consultations with relevant stakeholders during construction and operation phase of the sub-projects.
- Strengthen existing GRM to include provisions for addressing grievance related to ES risk management under RBP.
- Review GRM performance, procedures, and results regularly and include specific grievance cases in the progress reports.
- Consult AIIB for any change made to the ES systems during program implementation.
- Disclose the ESSA and the summary of ESSA in local language in a culturally appropriate manner.

5.3.2. **AIIB's Role**

The Project Team will work with the DSI to structure the support that AIIB provides in relation to the RBP's ES aspects during implementation of an RBP. Implementation support will include the following:

- Disclosure of the ESSA.
- Review of implementation progress and achievement of RBP results and DLIs.
- Provision of institutional capacity building and support to DSI to resolve implementation issues.
- Monitoring the performance of applicable ES systems, including the implementation of agreed ES strengthening measures in the RBP AP.
- Monitoring changes in RBP risks as well as compliance with the provisions of legal covenants.
- Collaborating with DSI to adapt management practice in a manner consistent with RBF principles, to improve the RBP implementation or respond to unanticipated challenges.

Annex 1. Indicative Matrix to Define RBP and Screen ES Effects

Areas in Gov't programs	Activities in Gov't programs	Relevance to Key RBP Result Areas	Potential ES Effects (Risks, impacts and benefits)	ES Categorization	Conclusion	Justification
<p>Area 1– Expanding access to efficient climate-resilient irrigation services for improved water and land use</p>	<p>Activity 1: Four schemes included in the Strategic Action Plan 2024-2028</p>	<p>The results area focuses on efficient and fair distribution of water, and sustainable use of soil and water resources for enhancing adaptation to climate change impacts</p>	<p>Benefits</p> <ul style="list-style-type: none"> • Enhance water efficiency and climate resilience • Contribute to agricultural productivity • Support sustainable land use by intensifying production on existing farmland, reducing pressure on forests and natural habitats • Promote climate-smart agriculture • Improve rural livelihoods and food security <p>Risks and Impacts</p> <ul style="list-style-type: none"> • Construction related risks and impacts such as air, noise, dust pollution from equipment and excavation works, waste generation, soil erosion and sedimentation from land clearing and earthworks, water pollution from construction runoff, and occupational and community health and safety, land acquisition risks • Irrigation activities may lead to water resource depletion, waterlogging and salinization, agrochemical runoff, biodiversity loss, and minimal risk if invasive species intrusion during operation phase 	<p>ES Categorization: B</p>	<p>To include Activity 1 in the RBP</p>	<p>High ES risk and impact sub-projects were excluded. The key environmental and social (ES) risks and impacts are considered to be medium, site-specific, temporary, reversible, and predictable, which can be effectively mitigated with standard construction practices and compliance with national regulations. ES Actions will include measures on ES (including OHS).</p>
<p>Area 2- Improving climate resilience of the existing irrigation systems</p>	<p>Activity 1: One scheme included in the Strategic Action Plan 2024-2028</p>	<p>The results area focuses on preservation of water in terms of quantity, including through introduction of modern irrigation systems for water savings in agriculture, and sustainable use of</p>	<p>Benefits</p> <ul style="list-style-type: none"> • Increase water use efficiency • Reduce energy consumption and greenhouse gas emissions • Improve water quality and reduce pollution by preventing runoff and contamination • Enhance climate resilience • Contribute to agricultural productivity • Support ecosystem protection 	<p>ES Categorization: B</p>	<p>To include Activity 1 in the RBP</p>	<p>High ES risk and impact sub-projects were excluded. The key ES risks and impacts are considered to be generally medium, site-specific, temporary,</p>

		<p>soil and water resources for enhancing adaptation to climate change impacts</p>	<ul style="list-style-type: none"> Improved rural livelihoods and economic stability Reduced vulnerability of farming communities to climate shocks More equitable access to water through well-managed distribution system <p>Risks and Impacts</p> <ul style="list-style-type: none"> Construction related risks and impacts such as air, noise, dust pollution from equipment and excavation works, waste generation, soil erosion and sedimentation from land clearing and earthworks, water pollution from construction runoff, and occupational and community health and safety, land acquisition risks Irrigation activities may lead to water resource depletion, waterlogging and salinization, agrochemical runoff, biodiversity loss, and minimal risk if invasive species intrusion during operation phase, resistance to adoption of new technologies 			<p>reversible, and predictable, which can be effectively mitigated with standard construction practices and compliance with national regulations. ES Actions will include measures on ES (including OHS).</p>
<p>Area 3- Enhancing climate resilience of flood-prone areas</p>	<p>Activity 1: Five schemes included in the Strategic Action Plan 2024-2028</p>	<p>The results area in flood protection and control investments focuses on the increase in the number of flood protection and control facilities to reduce potential human and infrastructure losses</p>	<p>Benefits</p> <ul style="list-style-type: none"> Reduce flood risk and protect communities Enhance climate resilience Contribute to agricultural productivity by minimizing crop losses and stabilizing yields Prevent soil erosion and land degradation Support ecosystem restoration Protection of livelihood <p>Risks and Impacts</p> <ul style="list-style-type: none"> Construction related risks and impacts such as air, noise, dust pollution from equipment and excavation works, waste generation, soil erosion and sedimentation from land clearing and earthworks, water pollution from construction runoff, and occupational and community health and safety, land acquisition and resettlement risks 	<p>ES Categorization: B</p>	<p>To include Activity 1 in the RBP</p>	<p>High ES risk and impact sub-projects were excluded. The key ES risks and impacts are considered to be generally medium, site-specific, temporary, reversible, and predictable, which can be effectively mitigated with standard construction practices and compliance with</p>

			<ul style="list-style-type: none"> Flood control works may additionally cause localized impacts to aquatic biota and habitats due to levee or embankment construction and land degradation from borrow material extraction during construction phase Flood control projects may result in altered natural flood regimes, erosion and sedimentation, downstream flooding, and water quality degradation during operation phase 			<p>national regulations. ES Actions will include measures on ES (including OHS).</p>
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Annex 2: Indicative List of ES Regulations

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
Environmental			
<p>Regulation on Environmental Impact Assessment (EIA) (29.07.2022 Official Gazette No: 31907)</p>	<p>Regulates the technical and administrative procedures and principles to be followed during the EIA process.</p>	<p>In case of individual investment projects under the RBP fall into the projects listed under Annex-1 or Annex-2 of the regulation, the regulation provisions apply for environmental impact assessment.</p>	<p>Ministry of Environment, Urbanization and Climate Change (MoEUCC)</p>
<p>Regulation on Environmental Permit and License (10.09.2014 Official Gazette)</p>	<p>Regulates the procedures and principles to be followed in the process of obtaining environmental permits and licenses required under the Environmental Law No. 2872.</p>	<p>In case individual investment projects under the RBP fall into the activities listed under</p>	<p>MoEUCC</p>

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
No: 29115)			Annex-1 or Annex-2 of the regulation, the regulation provisions apply for obtaining an environmental permit.	
Regulation on Environmental Audit (12.06.2021 Official Gazette No: 31509)	Establishes the procedures and principles related to inspections of facilities or activities for environmental protection under the Environmental Law No. 2872, the qualifications of the personnel who will conduct the inspections, the detection of violations, and the implementation of administrative sanctions. MoEUCC and its provincial directorates (through environmental inspectors) conduct audits and inspections in this context.		All sources of pollution, violations, facilities, and activities that fall within the scope of the Environmental Law and relevant legislation are subject to inspection.	MoEUCC
Regulation on Water Pollution Control (31.12.2004 Official Gazette No: 25687)	Establishes the necessary legal and technical principles to prevent water pollution in a manner consistent with sustainable development goals, to protect and ensure the optimal use of Türkiye's underground and surface water resources. Covers the planning principles and prohibitions related to the protection of water quality, the principles of wastewater discharge and discharge permit requirements, the principles related to wastewater infrastructure facilities, and the procedures and principles for monitoring and inspection to prevent water pollution.	In case a wastewater discharge is necessary to a receiving water body particularly during the construction phase, the discharge must be carried out in line with the regulation requirements.*		MoEUCC
Regulation on Soil Pollution Control and Point Source Polluted Areas	To prevent soil pollution as a receiving environment, identify areas and sectors where pollution exists or is likely to occur, and determine the principles for the cleaning up and monitoring of polluted soils and areas in a manner consistent with sustainable development goals.		In the event of soil pollution or contamination caused during the construction or operation	MoEUCC

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
(08.06.2010 Official Gazette No: 27605)			phase, the regulation provisions apply.	
Regulation on Waste Management (02.04.2015 Official Gazette No: 29314)	To determine the general procedures and principles regarding: (i) ensuring the management of waste from its generation to disposal without harming the environment and human health, (ii) reducing waste generation, promoting the reuse, recycling, and recovery of waste, thereby reducing the use of natural resources and ensuring effective waste management, and (iii) production, market surveillance, and inspection of products having specific criteria, basic conditions, and characteristics in terms of environmental and human health and within the scope of this Regulation.	The regulation provisions apply to the hazardous and non-hazardous waste generated. The waste generated during the construction and operation phases must be collected, stored, labeled, transferred and disposed of as per the regulation requirements. Türkiye has appropriate hazardous waste management facilities, and these facilities are required to have an environmental license/permit. Additionally, the transportation of such waste must be carried out using licensed transportation trucks.		MoEUCC
Regulation on Excavation Soil, Construction and Demolition Waste Control (18.03.2004 Official Gazette No: 25406)	Establishes the technical and administrative aspects and general rules to be followed regarding the reduction at source, collection, temporary storage, transportation, recovery, utilization, and disposal of excavation soil and construction and demolition wastes in a manner that does not harm the environment.		The excavation soil and construction waste generated during the construction phase must be temporary stored, transferred and disposed of as per the regulation requirements.	MoEUCC
Regulation on Management of Waste Oils (21.12.2019 Official Gazette No: 30985)	Establishes the procedures and principles to protect the environment and human health, and to ensure the efficient use of natural resources by defining the technical and administrative principles related to the temporary storage, collection, transportation, refining, energy recovery, and disposal of waste oils.		The waste oils generated during the construction and operation phases must be collected, stored, labeled, transferred and	MoEUCC

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		disposed of as per the regulation requirements.	
Regulation on Packaging Waste Control (26.06.2021 Official Gazette No: 31523)	Establishes strategies, policies, and procedures regarding: (i) the production and market placement of packaging and the responsibilities of operators, (ii) the prevention and reduction of packaging waste through reuse, recycling, and recovery, (iii) the management of packaging and packaging waste within a system based on circular economy and resource efficiency principles, (iv) the implementation of the deposit management system, and (v) the Türkiye Environment Agency's activities in managing packaging and packaging waste.	The packaging waste generated during the construction and operation phases must be collected, stored, labeled, transferred and disposed of as per the regulation requirements.	MoEUCC
Regulation on Control of Waste Batteries and Accumulators (31.08.2004 Official Gazette No: 25569)	Establishes the legal and technical principles for batteries and accumulators from production to disposal, including: (i) ensuring environmentally compliant production, (ii) preventing harmful environmental release, (iii) implementing quality control and harmful substance labeling, (iv) regulating import, export, and transit, (v) setting technical and administrative management standards, (vi) prohibiting harmful substance-containing batteries, and (vii) creating a collection and management plan for waste recovery or disposal.	The waste batteries and accumulators generated during the construction and operation phases must be collected, stored, labeled, transferred and disposed of as per the regulation requirements.	MoEUCC
Regulation on Management of Waste Electrical and Electronic Equipment (WEE) (26.12.2022 Official Gazette No: 32055)	Establishes strategies, policies, and procedures for: (i) preventing WEE through circular economy and resource efficiency principles, and when prevention is not possible, ensuring separate collection and setting methods and targets for reuse, recycling, and recovery to minimize disposal, (ii) managing WEE within a specific system, including zero waste management, without harming the environment and human health, and (iii) implementing extended producer responsibility for manufacturers of electrical and electronic equipment.	The WEEs generated during the construction and operation phases must be collected, stored, labeled, transferred and disposed of as per the regulation requirements.	MoEUCC
Zero Waste Regulation (12.07.2019 Official Gazette No: 30829)	Establishes principles and guidelines for creating, extending, developing, monitoring, financing, and documenting a zero-waste management system aimed at protecting the environment, human health, and all resources involved in waste management processes, aligning with sustainable development and effective raw material and natural resource management.	The regulation provisions apply to the facilities/places defined in the Annex-1 list of the regulation,	MoEUCC

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		as well as to those who wish to establish a zero waste management system on a voluntary basis.	
Regulation on Control of Vegetable Waste Oils (06.06.2015 Official Gazette No: 29378)	Regulates procedures and principles for managing vegetable waste oils from generation to disposal, establishing technical and administrative standards, and determining related principles, policies, and programs.	The vegetable waste oils generated during the construction phase must be collected, stored, labeled, transferred and disposed of as per the regulation requirements.	MoEUCC
Regulation on Medical Waste Control (25.01.2017 Official Gazette No: 29959)	Establishes procedures and principles for managing medical waste from generation to disposal, focusing on preventing harmful environmental and health impacts, and ensuring separate collection at the source, transportation within the healthcare facility, temporary storage, transportation to a processing facility, and disposal without environmental or health harm.	The medical waste generated during the construction phase must be collected, stored, labeled, transferred and disposed of as per the regulation requirements.	MoEUCC
Regulation on Environmental Noise Control	To mitigate the adverse effects of environmental noise on health and the environment, prepare noise maps and action plans, implement noise control measures, and inform the public about noise management activities. MoEUCC is responsible for implementing the regulation.	Project activities should comply with the environmental	MoEUCC

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
(30.11.2022 Official Gazette No: 32029)		noise and vibration limit values stipulated in the regulation, along with the relevant provisions of the regulation, during construction phase.	
Regulation on Environmental Noise Emission Caused by Equipment Used Outdoors (30.12.2006 Official Gazette No: 26392)	Establishes procedures and principles for applying noise emission standards to outdoor equipment, collecting technical documents and information, conducting conformity assessments, and marking, to protect human health and ensure the proper functioning of the internal market.	Outdoor equipment used in the construction or maintenance works should comply with the noise emission standards stipulated in the regulation.	Ministry of Industry and Technology
Regulation on Assessment and Management of Air Quality (06.06.2008 Official Gazette No: 26898)	To define and establish air quality targets to prevent or reduce the harmful effects of air pollution on the environment and human health, to assess air quality based on defined methods and criteria, to maintain the current situation in areas where air quality is good and to improve it in other cases, to collect sufficient information related to air quality, and to ensure that the public is informed through warning thresholds. MoEUCC is responsible for implementing the regulation.	Necessary measures should be taken for project activities to maintain/comply with ambient air quality standards.	MoEUCC
Regulation on Control of Exhaust Gas Emission	To protect living beings and the environment from the effects of air pollution caused by exhaust gases from motor vehicles in traffic, to ensure the reduction of exhaust gas pollutants, to control them by conducting measurements, and to determine the procedures and principles related to the implementation.	Motor vehicles used within the scope of project activities should	MoEUCC

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
(11.03.2017 Official Gazette No: 30004)		comply with the regulation provisions.	
Regulation on Surface Water Quality (30.11.2012 Official Gazette No: 28483)	Aims to classify and monitor the biological, chemical, physico-chemical, and hydromorphological qualities of surface, coastal, and transitional waters and establishes procedures and principles to protect, preserve, and achieve good water status, balancing protection and use in line with sustainable development goals.	Principles and guidelines for the protection of surface waters and receiving water bodies should be complied with within the scope of project activities.	Ministry of Agriculture and Forestry (MoAF)
Regulation on Protection of Groundwater Against Pollution and Deterioration (07.04.2012 Official Gazette No: 28257)	To establish the necessary principles for the protection of the current status of groundwater that is in good condition, to prevent the pollution and deterioration of groundwater, and to improve these waters.	Principles and guidelines for the protection of groundwater should be complied with within the scope of project activities.	MoAF
Regulation on Occupational Health and Safety (OHS) Services (29.12.2012 Official Gazette No: 28512)	To regulate the establishment of workplace health and safety units to carry out OHS services, the authorization of joint health and safety units, the cancellation of authorization certificates, their duties, authorities, and responsibilities, as well as the procedures and principles of their operation.	During the construction activities of the project, the employer should assign certified OHS staff (such as occupational physicians, occupational safety specialists, and	Ministry of Labor and Social Security (MoLSS)

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		other health personnel in workplaces in the very dangerous class with ten or more employees) and/or hire an authorized Joint OHS Unit to determine the necessary OHS measures, monitor their implementation, prevent work accidents and occupational diseases, carry out first aid, emergency treatment, and preventive health and safety services for the employees, in line with the regulation provisions.	
Regulation on OHS in Construction Works (05.10.2013)	To determine the minimum OHS requirements to be taken in construction works.	This regulation should be complied with during the construction activities of the	MoLSS

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
Official Gazette No: 28786)		project, including preparation of a health and safety plan prior to the commencement of construction work, and ensuring that the machinery, tools, equipment, materials and working methods used in the workplaces where construction works are carried out comply with the relevant technical legislation and accepted, harmonized national or international standards in terms of OHS.	
Regulation on OHS Risk Assessment (29.12.2012	To establish the procedures and principles for conducting risk assessments in terms of OHS in workplaces.	The employer should conduct a risk assessment in terms of OHS	MoLSS

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
Official Gazette No: 28512)		with the aim of ensuring, maintaining, and improving the health and safety of the working environment and employees, and completion of a risk assessment does not absolve the employer of the obligation to ensure OHS in the workplace. It should be carried out by a team formed by the employer, following the stages of identifying hazards, determining and analyzing risks, deciding on risk control measures, documentation, updating the work done, and renewing it when necessary,	

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		starting from the design or establishment phase for all workplaces, in line with the regulation provisions.	
<p>Regulation on Emergency Situations in Workplaces</p> <p>(18.06.2013 Official Gazette No: 28681)</p>	<p>To establish the procedures and principles for preparing emergency plans in workplaces, including prevention, protection, evacuation, firefighting, first aid, and similar activities, as well as the safe management of these situations and the designation of employees responsible for these tasks.</p>	<p>The employer should identify potential emergencies by evaluating possible incidents considering the working environment, materials, equipment, and conditions, and take preventive measures, conduct necessary evaluations, and prepare emergency response plans, and ensure drills are conducted, in line with regulation provisions. Employees should comply</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		with the preventive and restrictive measures taken as specified in the emergency plan.	
<p>Regulation on Use of Personal Protective Equipment (PPE) in Workplaces (02.07.2013 Official Gazette No: 28695)</p>	<p>To determine the procedures and principles regarding the characteristics, provision, use, and other matters related to PPE to be used in cases where the prevention or adequate reduction of workplace risks cannot be achieved through collective protection measures based on technical precautions, or through work organization or methods.</p>	<p>During the construction and operation phases of the project, appropriate PPE should be used as needed, in line with regulation provisions. The employer determines the necessary OHS measures and provides the required personal protective equipment free of charge based on the risk assessment. Employees must correctly use, maintain, and store the provided PPE according to their OHS</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		training and employer's instructions. employer's instructions.	
<p>Regulation on the Procedures and Principles of OHS Training for Employees</p> <p>(15.05.2013 Official Gazette No: 28648)</p>	<p>Regulates the procedures and principles of OHS training to be provided to employees.</p>	<p>The employer should prepare and implement OHS training programs, provide suitable venues and equipment, ensure employee participation and record attendance, and issue certificates upon completion. The employer should ensure that employees receive basic training on the topics specified in the regulation as soon as possible after starting work. These trainings should be repeated according to the workplace's</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		danger class (construction activities are classified as very dangerous), considering changing and emerging risks, in line with regulatory provisions.	
<p>Regulation on Duties, Authorities, Responsibilities and Trainings of Occupational Safety Experts</p> <p>(29.12.2012 Official Gazette No: 28512)</p>	<p>Regulates the qualifications, training, and certification of occupational safety experts assigned to OHS services, as well as their duties, authorities, responsibilities, and working procedures and principles.</p>	<p>Occupational safety experts who will work within the scope of the project activities should have a valid certificate as defined by the regulation and comply with the requirements of the regulation.</p>	<p>MoLSS</p>
<p>Regulation on Vocational Training of Those to Be Employed in Dangerous and Very Dangerous Jobs</p> <p>(13.07.2013 Official Gazette No: 28706)</p>	<p>Regulates the procedures and principles of vocational training for those working in dangerous and very dangerous jobs as determined by the OHS Law No. 6331.</p>	<p>Employees working in dangerous and very dangerous jobs, as listed in the annex of the regulation, within the scope of project activities (particularly during</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
			construction activities), should undergo vocational training before being hired.	
<p>Regulation on Suspension of Work in Workplaces</p> <p>(Last Amendment 11.02.2016 Official Gazette No: 29621)</p>	<p>To establish the procedures and principles for suspension of work in part or in whole at a workplace until the danger is eliminated when a situation posing a life-threatening risk to employees is identified in the buildings and annexes of the workplace, in the working methods and procedures, or in the work equipment, or when risk assessments have not been conducted in workplaces classified as very dangerous, such as mining, metal, and construction work, or in workplaces where hazardous chemicals are used or where major industrial accidents may occur, and for allowing the resumption of work at a workplace where a stoppage decision has been implemented according to this regulation.</p>	<p>The regulation provisions apply particularly during construction works within the scope of the project, when a situation or risk, as defined in the regulation, occurs, requiring the suspension of work until the danger is eliminated.</p>		MoLSS
<p>Regulation on Health and Safety Conditions in the Use of Work Equipment</p> <p>(25.04.2013 Official Gazette No: 28628)</p>	<p>To determine the minimum requirements that must be followed regarding health and safety in the use of work equipment in the workplace.</p>		<p>The regulation provisions should be complied with, particularly during construction works within the scope of the project, regarding the use and selection of work equipment, including taking all necessary measures to ensure that the work equipment</p>	MoLSS

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		used in the workplace is suitable for the tasks to be performed and that this equipment does not harm the employees in terms of health and safety.	
<p>Regulation on the Protection of Employees from Noise Related Risks</p> <p>(28.07.2013 Official Gazette No: 28721)</p>	<p>Establishes the minimum requirements for protecting employees from health and safety risks that may arise from exposure to noise, particularly risks related to hearing.</p>	<p>The regulation provisions, including requirements on noise exposure limit values, should be complied with, particularly in the construction works within the scope of project activities. This involves considering the noise level that employees are exposed to in the risk assessment carried out in the workplace and determining the exposure by making noise measurements,</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		when necessary, and implementing the necessary mitigation measures by the employer.	
<p>Regulation on the Protection of Employees from Vibration Related Risks</p> <p>(22.08.2013 Official Gazette No: 28743)</p>	<p>Establishes the minimum requirements to ensure the protection of employees from health and safety risks that may arise from exposure to mechanical vibration.</p>	<p>The regulation provisions, including requirements on vibration exposure limit values, should be complied with, particularly in the construction works within the scope of project activities. This involves considering the mechanical vibration level that employees are exposed to in the risk assessment carried out in the workplace and determining the exposure by making mechanical vibration measurements,</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		when necessary, and implementing the necessary mitigation measures by the employer.	
<p>Regulation on Health and Safety Measures in Working with Chemical Substances</p> <p>(12.08.2013 Official Gazette No: 28733)</p>	<p>Establishes the minimum requirements to protect the health of employees and ensure a safe working environment from existing or potential risks arising from the effects of chemical substances that are present, used, or processed in any way in the workplace.</p>	<p>The regulation provisions should be complied with, especially in construction activities within the project scope, and the employer is responsible for preventing employees' exposure to chemical substances, minimizing exposure when prevention is not possible, and protecting employees from these hazards. This includes identifying the presence of chemical substances, conducting risk assessment,</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		and implementing necessary mitigation measures.	
<p>Regulation on Dust Control (05.11.2013 Official Gazette No: 28812)</p>	<p>Establishes the procedures and principles regarding the necessary measures to combat dust in terms of OHS, in order to prevent risks that may arise from dust in workplaces and to ensure the protection of workers from the effects of dust.</p>	<p>The regulation provisions should be complied with, especially in construction activities within the project scope, and the employer is responsible for taking all necessary protective and preventive measures to prevent employees' exposure to dust and to protect employees from dust-related hazards in workplaces where any type of dust is generated. This includes conducting risk assessment and dust</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		measurements and implementing necessary mitigation measures.	
<p>Regulation on Health and Safety Signs (11.09.2013 Official Gazette No: 28762)</p>	<p>To determine the minimum requirements for the implementation of health and safety signs to be used in workplaces.</p>	<p>The regulation provisions should be complied with, especially in construction activities within the project scope, and the employer, based on the results of the risk assessment conducted at the workplace, must provide and ensure the use of health and safety signs as specified in the regulation in cases where workplace risks cannot be eliminated or sufficiently reduced through collective protection techniques or</p>	<p>MoLSS</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		measures, methods, or processes used in the organization of work.	
<p>First Aid Regulation</p> <p>(29.07.2015 Official Gazette No: 29429)</p>	<p>To increase the basic health knowledge of individuals and society, to teach first aid knowledge and skills to the community, to ensure the presence of first aid personnel in all public and private institutions/organizations according to the number of personnel, to reduce the risk of death and disability due to accidents; in this direction, to regulate the procedures and principles regarding the training of first aid trainer trainers, first aid trainers and first aiders, and the opening, operation and supervision of the centers that will organize these trainings.</p>	<p>Within the scope of OHS: (i) in less hazardous workplaces, 1 first aider for every 20 employees; (ii) in hazardous workplaces, 1 first aider for up to every 15 employees; and (iii) in very hazardous workplaces, 1 first aider for up to every 10 employees is mandatory as per the regulation. Considering that construction activities are classified as very dangerous; this requirement should be met within the scope of project activities.</p>	<p>Ministry of Health</p>
<p>Regulation on the Recommendation, Application, and Registration Procedures of Plant Protection Products</p> <p>(03.12.2014 Official Gazette No: 29194)</p>	<p>To ensure the diagnosis of harmful organisms affecting plants and plant products, the recommendation of plant protection products (pesticides) to be used, the application of these products in agricultural production areas and storage facilities in accordance with agricultural control technical instructions and technical recommendations, and the recording of these applications to ensure traceability in terms of food safety in plants and plant products.</p>	<p>In case use of pesticides is required, the regulation provisions should be complied with.</p>	<p>MoAF</p>
<p>Regulation on Good Agricultural Practices</p> <p>(07.12.2010 Official Gazette No: 27778)</p>	<p>To regulate the procedures and principles of good agricultural practices to be carried out for agricultural production that does not harm the environment, human and animal health, the protection of natural resources, traceability and sustainability in agriculture, and the supply of reliable products. Ministry of Agriculture and Forestry</p>	<p>The regulation provisions should be complied with for good agricultural practices and to obtain relevant certificate in this respect.</p>	<p>MoAF</p>
<p>Regulation on the</p>	<p>To determine the procedures and principles related to the protection of ecological balance, the conduct of organic</p>	<p>The regulation</p>	<p>MoAF</p>

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
Principles and Implementation of Organic Agriculture (18.08.2010 Official Gazette No: 27676)	agricultural activities, the regulation, development, and dissemination of organic agricultural production and marketing.		provisions should be complied with in the implementation of organic agriculture.	
Regulation on Chemical Fertilizers Used in Agriculture (18.03.2004 Official Gazette No: 25406)	To determine the procedures and principles regarding the identification, naming, labeling, packaging, and inspection of types and compositions of chemical fertilizers used in agriculture.		The chemical fertilizer used in agriculture should comply with the regulation requirements.	MoAF
Social				
Labor Code No. 4857 (10.06.2003 Official Gazette No: 25134)	To regulate the rights and obligations related to working conditions and the working environment for employers and employees working under an employment contract. This Law applies to all workplaces, employers, employer representatives, and employees, regardless of the nature of their activities, except for the exceptions specified in Article 4. Workplaces, employers, employer representatives, and employees are subject to the provisions of this Law regardless of the notification date specified in Article 3.	This Law is relevant to the RBP as it ensures that all employment relationships under the Program comply with national labor standards, including fair working conditions, non-discrimination, minimum working age requirements, and occupational protections. It provides a legal foundation for labor management, contractor oversight, and worker rights within Program activities. Under the RBP, implementing agencies and contractors must adhere to these provisions to ensure safe and equitable working environments and to prevent harmful or exploitative forms of labor and working conditions.	MoLSS	
Criminal Code Law No.5237 (12.10.2004 Official Gazette No: 25611)	The objective of the Criminal Code (Law No. 5237) is to protect individual rights and freedoms, public order and security, the rule of law, public health, public morality, and the environment by defining criminal acts and prescribing corresponding sanctions. The Code applies to all individuals who commit criminal offenses within Türkiye's jurisdiction, as well as offenses committed abroad in cases	The Criminal Code is relevant to the RBP by providing the overarching legal basis for preventing and addressing criminal acts that may arise in connection with Program activities, including corruption, fraud, falsification of documents, coercion, threats,	Ministry of Justice	

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
	specified by law. It establishes general principles of criminal responsibility, including legality of crimes and penalties, individual criminal liability, proportionality, and human rights protections in criminal justice processes.	and offenses related to worker welfare and public safety. It reinforces accountability and ethical conduct among public officials, contractors, and third parties involved in Program implementation. Compliance with the Criminal Code supports the Program's integrity, safeguards beneficiaries and workers, and upholds lawful and ethical execution of activities.		
Expropriation Law No. 2942 (08.11.1983 Official Gazette No: 18215) (as amended by Law No. 4650 in 2001)	The Expropriation Law (Law No. 2942) regulates the procedures and principles for acquiring immovable property and associated rights for public interest purposes. It ensures lawful expropriation based on a prior public interest decision, fair and advance compensation, and transparent valuation procedures. The Law applies to all public institutions and agencies authorized to acquire land, and provides affected property owners the right to negotiate, receive compensation based on market value, and seek judicial review of expropriation decisions and valuations.	This Law is relevant to the RBP as it governs land acquisition processes for Program-related investments, ensuring that any necessary land acquisition is conducted lawfully, transparently, and with fair compensation to affected owners. Under the RBP, activities involving large-scale displacement or significant adverse social impacts are excluded; however, for eligible cases requiring limited land acquisition, this Law provides the legal foundation for protecting property rights, ensuring due process, and supporting equitable and timely compensation.	MoEUC	
Settlement Law No. 5543 (26.09.2006 Official Gazette No: 26301)	The Settlement Law regulates the resettlement of individuals and households affected by disasters, security-related displacement, land consolidation, and state-led settlement policies. It aims to provide housing, land, and support for livelihood restoration for eligible groups, primarily in rural areas, through planned resettlement and state assistance mechanisms.	In sub-projects involving physical displacement, land acquisition is governed primarily by the Expropriation Law. The Settlement Law (Law No. 5543) does not apply automatically to infrastructure projects;	MoEUC	

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		<p>however, it may serve as a complementary legal framework in cases where physically displaced households require relocation support beyond cash compensation. In such cases, the provisions of the Settlement Law may be referenced to support housing assistance or resettlement arrangements, as applicable, in line with RBP objectives and ESSA Core Principles.</p>	
<p>The Regulation on the Implementation of Land Consolidation and On-Farm Development Services (Official Gazette)</p>	<p>To determine the procedures and principles regarding the consolidation of agricultural lands and field development services. It covers the procedures and principles related to land consolidation and field development services.</p>	<p>This Regulation is relevant to the RBP where land consolidation accompanies irrigation modernization or rural water</p>	<p>MoAF</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
07.02.2019, No. 28949)		infrastructure activities. Although the RBP excludes activities that may cause significant displacement or social harm, land consolidation activities—if applied—must comply with this Regulation to ensure transparent planning, equal-value land redistribution, stakeholder consultation, and fair resolution of objections. Compliance supports secure land tenure, equitable benefit distribution, and socially responsible land reorganization within Program activities.	

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
Land Registry Law No. 2644	To regulate the registration, documentation, and legal recognition of immovable property rights in Türkiye. The Law applies to all immovable properties and mandates that real estate transactions and rights become legally valid only upon proper registration in the land registry. It also outlines rules for cadastral records, property boundaries, title deed issuance, and the protection of property rights, including mechanisms for dispute resolution and correction of registry records.	This Law is relevant to the RBP as it underpins secure land tenure and transparent land transactions in Program areas, supporting land-related activities such as land consolidation, limited land acquisition, and easement establishment for irrigation or flood control infrastructure. Compliance with the Law ensures accurate land records, protection of property rights, and legally valid land adjustments under the Program. It also supports due diligence, transparency, and fair engagement with landowners within the Program scope, while high-risk activities involving extensive land acquisition or uncertain land tenure will be excluded from the RBP.	MoEUCC
Pasture Law No. 4342 (28.02.1998 Official Gazette No. 23272)	To identify pastures, summer pastures, winter pastures, and public meadows and grasslands that have been allocated by various laws or have been in use since ancient times, their delimitation, their allocation on behalf of village or municipal legal entities, their use in accordance with the rules to be determined, their maintenance and improvement to increase and sustain their productivity, the continuous monitoring of their use, their protection, and, when necessary, the change of their intended use. This includes pasture, summer pasture, and winter pasture areas, as well as public meadows and grasslands.	This Law is relevant to the RBP where irrigation or flood control investments may intersect with designated pasture areas or community grazing lands. The RBP excludes high-risk activities that could cause significant livelihood impacts or land conversion; however, when limited land use adjustments or easement needs arise, compliance with the Pasture Law ensures lawful land access, protection of communal rights, compensation for pasture conversion, and stakeholder consultation. This framework safeguards rural community rights and pasture resources while supporting responsible implementation of Program-related land interventions.	MoAF
Forestry Law No. 6831 (08.09.1956 Official Gazette)	To govern the protection, management, development, and use of forests and forest resources in Türkiye; define forest boundaries, regulate forest land classification, and prohibit unauthorized clearing, occupation, and conversion of forest areas; establish rules for forest conservation, reforestation, afforestation, forest utilization, and prevention of forest degradation, including fire prevention and	This Law is relevant to the RBP where irrigation or flood control activities may interact with or be located near forest areas. As the RBP excludes sub-projects with significant adverse environmental or social impacts, including those involving unauthorized land conversion or damage to natural habitats, compliance with the Forest Law ensures that any Program activities respect legally	MoAF

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
No: 9402)	enforcement measures. It mandates that forest lands are State property unless otherwise legally defined, and prescribes administrative and criminal penalties for illegal activities affecting forests. The Law applies nationwide.	protected forest zones, avoid unlawful land clearance, and obtain required approvals where minor easements or crossings may be necessary. The Law supports sustainable land use, environmental protection, and lawful implementation of Program-related works.		
Regulation on Environmental Impact Assessment (EIA) (29.07.2022 Official Gazette No: 31907)	The Regulation on Environmental Impact Assessment (Official Gazette 29.07.2022, No. 31907) establishes procedures for assessing potential environmental impacts of proposed projects and ensuring public participation in decision-making. The projects in Annex 1 list are required to prepare sub-project specific Stakeholder Engagement Plans (SEP) that is annexed to the EIA Application File.		This Regulation is relevant to the RBP as it reinforces the requirement for transparent and inclusive stakeholder engagement in planning and implementing eligible activities. The principles of public participation, information disclosure, and grievance input reflected in this Regulation guide Program-level stakeholder engagement. Ensuring early community involvement and systematic feedback collection supports social acceptance,	MoEUCC

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		minimizes grievances, and aligns with the RBP's emphasis on participatory implementation and accountability.	
<p>Right to Information Law No. 4982 (24.10.2003, Official Gazette No: 25269)</p>	<p>To regulate the principles and procedures regarding the exercise of the right to information by individuals in accordance with the principles of equality, impartiality, and transparency required by democratic and transparent governance. This applies to the activities of public institutions and organizations, as well as professional organizations with the status of public institutions.</p>	<p>This Law is relevant to the RBP by enabling transparency, information access, and public oversight of Program activities. It supports stakeholder engagement, grievance processes, and accountability mechanisms by ensuring that citizens and affected parties can request and receive information about Program-related decisions, procedures, and outcomes.</p>	<p>Ministry of Justice</p>

Legislation	Objectives/Scope of Legislation	Relation to the RBP	Governing Authority
		Implementing agencies must comply with information disclosure requirements to promote trust, ensure transparency, and strengthen public participation in Program implementation.	
Right to Petition Law No. 3017 (10.11.1984, Official Gazette No: 18571)	To regulate the manner in which Türkiye's citizens and foreigners residing in Türkiye exercise their right to submit written petitions and complaints to the Grand National Assembly of Türkiye and the competent authorities regarding matters concerning themselves or the public. This covers petitions and complaints submitted by Türkiye's citizens and foreigners residing in Türkiye to the Grand National Assembly of Türkiye and administrative authorities.	This Law is relevant to the RBP as it guarantees public access to grievance channels and formal mechanisms for raising concerns about Program activities. It supports transparency, accountability, and citizen engagement by ensuring individuals can submit complaints or requests related	Ministry of Justice

Legislation	Objectives/Scope of Legislation		Relation to the RBP	Governing Authority
			to Program implementation and receive timely responses. Compliance with this Law enhances the Program's grievance redress system and helps ensure that beneficiary feedback and concerns are formally addressed during implementation.	
Law on Social Services Law No. 2828 (27.05.1983, Official Gazette No: 18059)	The Social Services Law in Türkiye aims to protect individuals and groups who need support, such as children, persons with disabilities, the elderly, and families facing economic or social difficulties. Its scope covers the organization, delivery, and supervision of social services to ensure safety, care, rehabilitation, and social inclusion. The law sets standards for both public and private institutions and ensures that care and assistance are provided according to professional principles. Overall, it establishes the legal foundation for a fair, accessible, and coordinated social welfare system.	The law supports a rights-based approach by recognizing social services as entitlements, not charity. It emphasizes equality, non-discrimination, and state responsibility in meeting the needs of vulnerable individuals. By ensuring transparency, accountability, and participation, the law aligns with the principles of human rights and international standards. This approach ensures that beneficiaries receive services that respect their dignity and empower them, while also holding institutions accountable for providing adequate and equitable care.	Ministry of Family and Social Services	

* In case wastewater generated is discharged into the sewerage system during the construction or operation phase, then a wastewater connection certificate/permit from the relevant municipality's wastewater substructure facilities should be obtained as per the relevant municipal regulation.

Other legislation that might also be indirectly relevant to the RBP:

- Agricultural Law
- Law on Veterinary Services, Plant Health, Food and Feed
- Forestry Law
- Groundwater Law
- Law on Conservation of Cultural and Natural Assets
- Law on Soil Conservation and Land Use
- National Parks Law
- Pasture Law
- Land Hunting Law
- Law on Protection of Animals
- Regulation on the Licensing and Marketing of Plant Protection Products
- Regulation on the Protection of Wetlands
- Regulation on Wildlife Preservation and Wildlife Development Areas

Annex 3: Summary of Public Consultation Events and Stakeholder Engagement during the ESSA

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
<p>Mission:</p> <p>Meeting with DSI officials (Department of Foreign Relations; Department of Real Estate and Expropriation; Investigation, Planning and Allocation Department; Support Services Department)</p>	Oct. 6-7, 2025	Program design and implementation process.	Risks related to land acquisition, labor management, OHS, cultural heritage, biodiversity (natural habitats, protected areas, etc.), transboundary water associated facilities, dam safety and gender.	In projects where contracts with contractors have already been signed (in ongoing projects), the additional ES requirements needed, if any, may not be reflected in the existing contracts.	Institutional capacity, resources and existing system to manage ES risks including land, environment, OHS, CHS, GRM, and stakeholder engagement.	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
Mission: Meeting with DSI 6th Regional Directorate	Oct. 9, 2025	Presentations related to the Mersin Pamukluk sub-project, relevant field visits	Risks related to land acquisition, labor management, OHS, and environment			
Mission Meeting with DSI officials (Department of Foreign Relations, 6th Regional Directorate), Contractor, Farmer, Mersin Irrigation Union President	Oct. 9, 2025	ES monitoring/reporting is limited; no structured ES logs or consolidated reporting. No comprehensive gender-disaggregated data (women farmers unknown). GRM for workers and communities is informal and undocumented.	Transition from pumped irrigation to gravity-fed systems may impact the workforce structure, but redeployment plans suggest low labor displacement risk, though still requiring monitoring. Large farmer population may lead to equity and access issues without strong allocation rules. Community grievances exist but are channeled primarily through informal means (mukhtars or DSI contacts), indicating	Existing infrastructure and staffing patterns may limit the flexibility of institutions to adjust to new program requirements, especially for documentation-heavy ES tasks.	OHS monitoring is primarily carried out through field supervisors' notebooks and general logs, with no unified monitoring system or standardized reporting format, creating inconsistencies. Worker OHS procedures meet contractual minimums but lack integrated ES data management, hindering RBP verification requirements. Community grievance channels exist	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
			potential gaps in managing community-level ES impacts.		informally through mukhtars and DSI contacts; however, unions and contractors lack formal GRMs, reducing institutional readiness for systematic ES risk management under the RBP.	
Mission Meeting with DSI officials (Department of Foreign Relations, 6th Regional Directorate), Automation System Company – ELMAN, Kozan Irrigation Union President	Oct. 10, 2025	The technological good practices implemented in other projects were explained.	-	-	-	
Discussion with DSI - Department of Real Estate and Expropriation	Oct. 31, 2025	Discussions on expropriation and land consolidation processes, the system for keeping expropriation records, land acquisition situations	Expropriation in flood-control areas may involve house demolitions, creating temporary displacement and economic impacts. Land acquisition	-	Capacity for proactive engagement and data collection on women and vulnerable groups is limited.	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
		related to projects, and the operation of the complaint mechanism	<p>may be necessary in irrigation areas outside of land consolidation, which may cause economic displacement.</p> <p>Informal users not being covered by compensation payments in land acquisition processes</p>			
Discussion with DSI - Investigation, Planning and Allocation Department	Oct. 31, 2025	<p>Discussions on organizational structure, staff numbers and trainings provided.</p> <p>ES monitoring and reporting framework particularly for EIA-exempt projects.</p>	<p>Expansion of irrigated agriculture may increase pesticide and fertilizer use, leading to soil, groundwater, and surface water quality risks, but there is adequate legislation in force to manage these risks. No dredging foreseen for flood control sub-projects but just riverbed levelling.</p> <p>Basin Master Plans</p>	EIA and monitoring requirements differ between Annex 1, Annex 2, and "EIA exempt" projects.	-	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
			are prepared by DSI considering environmental issues and cumulative impacts, and existing plans are planned to be updated soon. As a result of the updated plans, an adaptive management approach at the basin level will be applied to address emerging risks and impacts and the need for additional measures.			
Discussion with DSI - Support Services Department	Oct. 31, 2025	Information is obtained regarding staff numbers, training provided, and the portal used by General Directorate staffs to submit complaints Discussion on Internal Occupational Health	DSI's joint liability and legal risks resulting from inappropriate practices by contractors, if any;		Inadequacy of data collection and reporting systems; lack of digital integration.	

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
		and Safety Directive (September 2024) of DSI, and the accident reporting circular issued by DSI for World Bank–financed projects aims to ensure that occupational accident management in internationally funded projects is carried out in a transparent, timely				
Appraisal Mission Meeting with DSI officials (Department of Foreign Relations; Department of Real Estate and Expropriation; Investigation, Planning and Allocation Department; Support Services Department; Department of Irrigation; Department of Flood Control)	Nov. 17-21, 2025	Program design and implementation including ES risk management arrangements for irrigation and flood control components including land acquisition and transboundary waterways; ESSA RB Action Plan Draft Discussion	ES responsibilities are spread across departments, requiring stronger coordination through designated ES focal points; ES and OHS monitoring and supervision need strengthening, particularly for ongoing construction activities that are exempt from the EIA process; grievance handling requires			

Consultations/ Stakeholder Activities	Date/Time	Summary of Consultation Results				
		Key discussions with the ES systems related to the RBP	Potential ES risks and impacts of the RBP	Potential contextual and programmatic risks to the RBP	Institutional capacity issues to manage the ES risks and impacts of the RBP	Other issues
			improved recording of verbal complaints and stronger basin-level communication; land acquisition systems are generally robust but require enhanced monitoring of replacement cost compensation and livelihood outcomes; gender participation in irrigation and water management remains limited			

Annex 4: Indicative Checklists for Assessing the ESMS against Core Principles and Core Elements

Criteria set out in the ESP (Core Principles)	Criteria set out in RBF IGN (Core Elements)	Indicative Checklists
<p>Core Principle 1: Promote environmental and social sustainability in the RBP's design.</p>	<p>(a) Operate within an adequate legal and regulatory framework to guide ES impact assessments, mitigation, management and monitoring at RBP level.</p>	<ul style="list-style-type: none"> • What relevant ES laws, regulations, procedures, decrees, or other mandatory legal instruments (national, regional, and sectoral/program levels) are applicable to the RBP activities and their associated risks and impacts? Refer to section 3.1.1 and Annex 2 • Are critical adjustments and measures to the regulatory framework needed before the start of the RBP? No • Do the relevant ES management systems include mechanisms, where appropriate, to ensure objective or independent assessment of ES impacts? Yes
<p>Core Principle 2: avoid, minimize or mitigate adverse impacts and promote informed decision-making relating to the RBP's environmental and social impacts.</p>	<p>(b) Incorporate recognized elements of good practice in ES assessment and management, including: (i) early screening of potential impacts;</p>	<ul style="list-style-type: none"> • Do the applicable ES management systems require early screening of potential ES impacts. Yes • Do relevant procedures require ES screening/assessment of activities associated with the RBP? Yes • Are ES screening procedures comprehensive? Yes • Does screening lead to ES assessments that are proportional in depth and scope to the identified adverse impacts and risks (e.g., does it apply ES risk categories?) Partially Yes – EIA Regulation classifies project activities in two categories as Annex 1 and Annex 2 projects. • Do screening procedures include opportunities for stakeholder involvement in the identification of priority ES risks and impacts? Yes • Do these requirements specifically apply to the Program to be supported by the RBP operation? Has screening for, and estimation of, ES effects been a part of the Borrower's program design? Yes, but most of the sub-projects are exempt from EIA Regulation. Additionally, screening is being used for World Bank-financed projects, even for those exempt from the EIA Regulation. • Has RBP screening identified potential sub-projects under the Environment and Social Exclusion List (ESEL)? If such activities have been identified, have the activities been excluded from the program? The proposed sub-projects under the RBP have been screened, and the RBP does not include any High ES risk sub-projects and activities under ESEL.
	<p>(ii) consideration of strategic, technical, and site alternatives (including the “no action” alternative);</p>	<ul style="list-style-type: none"> • Do the applicable ES management systems require the consideration of alternatives or other forms of options assessments to avoid or minimize potential impacts and risks? I.e., are strategic, technical, and site-selection alternatives considered, including a “do nothing” option? Yes • Which other forms of strategic planning, such as sectoral master planning, are used to identify ES risks and impacts? Do they consider relative ES costs and benefits? The latest Water

Criteria set out in the ESP (Core Principles)	Criteria set out in RBF IGN (Core Elements)	Indicative Checklists
		<p>Basin Master Plans were prepared for all basins in Türkiye between 2013 and 2016. These plans take into account water balance, baseline water quality, and other relevant environmental considerations in basin water management. The master plans are scheduled to be updated and will be subject to the Strategic Environmental Assessment Regulation.</p> <ul style="list-style-type: none"> • Has RBP screening considered site alternatives? N.A. – this is part of the Basin Master Plans
	(iii) explicit assessment of potential, induced, and cumulative impacts;	<ul style="list-style-type: none"> • Do RBP procedures require the consideration of induced and cumulative impacts as part of screening, options assessment, and/or ES Impact Assessment? N.A. – this is part of Türkiye’s ES system • Do the procedures allow for, or promote, the use of tools (such as strategic ES impact assessments and/or strategic management plans) to help identify and evaluate such impacts? Partially Yes - Water Basin Master Plans, prepared between 2013 and 2016, are scheduled to be updated and will be subject to the Strategic Environmental Assessment Regulation. • Do the procedures include measures for evaluating critical environmental issues such as transboundary pollution, biodiversity loss, transboundary water, and climate change? If so, do they consider the implications to and from RBP activities (i.e., double materiality)? Partially Yes – Sub-projects resulting in significant adverse impacts on protected areas or biodiversity areas as defined by national law, or on critical natural habitats are not eligible for financing under the RBF and are excluded from RBP. Moreover, the strategic objectives of the RBP include the sustainable use of soil and water resources to enhance adaptation to climate change impacts and to improve the climate-resilience of flood-prone areas. • Do RBP systems require assessing the risks from natural disasters and/or human emergencies? Yes • Does the RBF assessment provide adequate opportunities to engage stakeholders on induced, cumulative, and transboundary impacts? Yes
	(iv) identification of measures to mitigate adverse environmental or social risks and impacts that cannot be otherwise avoided or minimized;	<ul style="list-style-type: none"> • Do the applicable systems effectively promote the application of the mitigation hierarchy (e.g., avoid, minimize, mitigate, compensate/offset)? Yes • Are mitigation/management measures under the system relevant and realistic? Yes • Do they require time-bound actions, clear targets, and clear assignment of responsibilities for implementation? Partially Yes • Do the applicable systems include clear and appropriate repercussions and remedies in case ES mitigation measures are not applied? Partially Yes
	(v) clear articulation of institutional	<ul style="list-style-type: none"> • Are RBP entities responsible for ES aspects adequately resourced and staffed—in terms of

Criteria set out in the ESP (Core Principles)	Criteria set out in RBF IGN (Core Elements)	Indicative Checklists
	responsibilities and resources to support implementation of plans; and	<p>skills, qualifications, and number of staff—to ensure effective administration, planning, design, implementation, and monitoring functions? Yes, but monitoring and supervision function needs to be strengthened.</p> <ul style="list-style-type: none"> • If the RBP does not include sufficient in-house capacity for the Client, what other alternative arrangements (e.g., coordination with other agencies, use of consulting services) are available to promote program effectiveness? If present, what arrangements are in place to ensure effective and timely coordination? If none, what needs have been identified for supplementary support and/or capacity strengthening? ES focal points will be assigned by DSI to coordinate all the ES issues and RBP-related actions • Are the RBP entities effective at applying their ES frameworks in practice? Are “adaptive management” processes in place to respond to unanticipated ES management issues? Yes – The ES framework is being applied in World Bank-financed projects, and DSI has begun developing its own Institutional Environmental and Social Management System, particularly for internationally funded projects. • Do RBP entities have access to contingency funds for unexpected impacts or budget shortfalls? Yes • With the screening results on potential ES impacts, if the agency has any issues with budget for managing the potential impacts. No budget issues
	(vi) responsiveness and accountability through stakeholder consultation, timely dissemination of the RBP information, responsive grievance redress mechanisms and access to independent accountability mechanisms.	<ul style="list-style-type: none"> • What mechanisms do program entities use to ensure that stakeholders are identified and that their views, concerns, and suggestions are systematically considered? It uses existing corporate and national GRM. In addition, project-specific GRMs are also used in internationally financed projects. • Does the Borrower consult with stakeholders on various aspects of RBP design and operation? Yes • What are the implementation practices of the agency in disclosing of relevant RBF information. RBF information is disclosed on DSI’s website. • What are the implementation practices of the agency in managing if complaints/grievances. There is a mechanism operating at the national, institutional, or project specific levels. details of which are provided in Section 4 of the ESSA. • Does the Borrower have specific laws or regulations on information disclosure and grievance address. According to the EIA Regulation, projects listed under Annex 1 include information on disclosure and grievance procedures in the Stakeholder Engagement Plans (SEP) specific to the sub-project attached to the EIA Application File. For details on other regulations and laws, see Annex 2.
Core Principle 3: avoid, minimize, or	(c) Identify and screen for adverse impacts on potentially important	<ul style="list-style-type: none"> • Has RBP screening identified potential impacts on modified, natural, or critical natural habitats? If such impacts involve the significant conversion or degradation of critical natural

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mitigate adverse impacts on natural habitats and cultural resources resulting from the RBP.	biodiversity and cultural resource areas and provides adequate measures to avoid, minimize, or mitigate adverse impacts.	<p>habitats, have the activities been excluded from the program? Sub-projects that result in significant adverse impacts on protected areas or biodiversity areas as defined by national law, or on critical natural habitats are not eligible for financing under the RBF and were excluded from RBP.</p> <ul style="list-style-type: none"> • Will the RBP activities affect environmentally sensitive habitat areas with local importance, such as streams, wetlands, ponds, and vegetated riparian areas? No. • Would RBP activities lead to the fragmentation of existing habitat areas, both at the level of localized Program activities and at larger landscape levels? No. • Do management plans require appropriate conservation and mitigation measures to be in place, including those required to maintain ecological services? Yes, under the Basin Master Plans.
	<p>(d) Support and promote protection, conservation, maintenance, and rehabilitation of natural habitats; avoid significant conversion or degradation of critical natural habitats; and</p> <p>if avoiding the significant conversion of natural habitats is not technically feasible, include measures to mitigate or offset the adverse impacts of RBP</p>	<ul style="list-style-type: none"> • Does the RBP include management measures to protect, conserve, or rehabilitate habitats that are at risk? Are these measures consistent with recognized international good practice, including internationally recognized standards of sustainable forest management and use? N.A. for the RBP • Are monitoring measures in place to determine the extent to which habitats are affected under the RBP? N.A. for the RBP. • Have the relevant management authorities and other key stakeholders for such protected areas been consulted or otherwise involved in decisions that may affect the legal status or habitat values of the area? There are no such protected areas that will be affected within the scope of the RBP; however, relevant authorities are consulted to ensure the protection and conservation of such areas, even if sub-projects are exempt from the EIA Regulation. • If RBP activities may cause conversion or degradation of non-critical natural habitats, do Environmental Impact Assessment procedures include consideration of measures to avoid or minimize the severity of impacts? N.A. for the RBP • Do plans require appropriate conservation offset measures to be in place, including measures to maintain ecological services? N.A. for the RBP
	(e) Take into account potential adverse impacts on cultural resources and provide adequate measures to avoid, minimize, or mitigate these impacts.	<ul style="list-style-type: none"> • Does the screening review involve careful attention to avoiding impacts on resources of archaeological, paleontological, historical, architectural, religious, or cultural significance? Yes, even if the sub-projects are exempt from EIA Regulation, relevant authorities are consulted to ensure that impacts on such cultural resources are avoided, and management plans are prepared and implemented accordingly. • Is the mitigation hierarchy principle applied in the management of potential adverse impacts on physical cultural property, such as management measures to avoid, minimize, or mitigate? Yes

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		<ul style="list-style-type: none"> Do Borrower systems include “chance find” procedures to take effect whenever RBP activities result in discovery of, or disturbance to, physical cultural resources? Yes, procedures to be followed in the event that unknown physical cultural resources are discovered (chance finds) are explained in the relevant law.
<p>Core Principle 4: protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the RBP; (ii) exposure to toxic chemicals, hazardous wastes and other dangerous materials under the RBP; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</p>	<p>(f) Promote adequate community, individual, and worker health, safety, and security, through the safe design, construction, operation, and maintenance of the RBP or, in carrying out activities dependent on existing infrastructure, incorporate safety measures, inspections, or remedial works as appropriate; promote measures to address child and forced labor.</p>	<ul style="list-style-type: none"> Does the RBP have a legal framework that addresses and promotes workplace safety? Are there mandatory measures that compel contractors and facility operators to operate equipment and facilities in a manner that protects individuals and communities? Yes Does the Borrower require measures to help protect individuals and/or communities from violence, intimidation, harassment, criminal activity, or other negative interactions with contractors, laborers, operators, or other workers associated with a Program activity? Yes Does the Borrower have specific laws or regulations to avoid the use of child and forced labor in the implementation of Program activities? Yes
	<p>(g) Promote the use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated under the RBP.</p>	<ul style="list-style-type: none"> Does the Borrower have specific laws, regulations, procedures, standards, etc., to effectively evaluate and manage the potential effects of hazardous or toxic materials in the workplace? Yes Does the RBP include safety measures and standards for pre-existing civil works or works under construction that pose potential hazards to people or the environment? Yes Are emergency preparedness plans implemented and periodically reviewed? If plans are deficient, what safety measures or remedial works do Program entities need to undertake? Yes, measures are covered in the relevant regulation.
	<p>(h) Promote the use of integrated pest management practices to manage or reduce pests or disease vectors; and provide training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with the relevant international guidelines and conventions.</p>	<ul style="list-style-type: none"> Where relevant, do RBP systems promote the use of integrated pest management practices to manage or reduce pests or disease vectors? Sub-projects are not intended to promote the use of chemical fertilizers or pesticides. However, due to increased agricultural crop production, there may be a corresponding rise in the use of pesticides or agrochemicals. Türkiye has sufficient legislation to manage the use of chemical fertilizers and pesticides, and promotes the use of integrated pest management practices. Does the RBP include appropriate technical guidelines and training for the safe production, storage, transport, use, and disposal of hazardous pesticides or other chemicals? N.A. for the RBP
	<p>(i) Include adequate measures to</p>	<ul style="list-style-type: none"> As relevant, does the RBP include measures to ensure that people or the environment would not be put at increased risk from natural hazards? Yes

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	<p>avoid, minimize, or mitigate community, individual, and worker risks when the RBP is located in areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or affected by climate events.</p>	<ul style="list-style-type: none"> Does the Borrower assess the climate change risks associated with RBP activities, such as the estimation of the RBP’s GHG emissions or the inclusion of appropriate mitigation and/or adaptation measures under the RBP operation? The strategic objectives of the RBP include the sustainable use of soil and water resources to enhance adaptation to climate change impacts and to improve the climate-resilience of flood-prone areas.
<p>Core Principle 5: manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at a minimum restoring, their livelihoods and living standards;</p>	<p>(j) Avoid or minimize land acquisition and related adverse impacts; identify and address economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people lacking full legal rights to resources they use or occupy;</p> <p>provide compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid before taking land or restricting access;</p> <p>provide supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment);</p> <p>restore or replace public infrastructure and community services that may be adversely affected by the RBP; and</p>	<ul style="list-style-type: none"> Does the RBP screen all planned activities to determine if they may require involuntary land acquisition, relocation of residences or businesses, or restrictions to natural resources? Yes Do RBP processes require identification and mitigation of all land-related impacts? Significantly, do systems adequately protect individuals and communities against “forced evictions”? Yes As relevant, does screening consider impacts on various property regimes, including common property resources, customary or traditional rights to land or resource use, those who lack title or any recognizable claim, and Indigenous Peoples rights? Accordingly, do the processes require identification and mitigation of all significant impacts affecting informal users or occupiers of land (or other resources)? Even if Türkiye’s land acquisition legislation primarily applies to formal users, the interpretation of Article 19 of the Expropriation Law and DSİ internal procedures provide mechanisms for identifying and compensating informal land users under certain conditions, including treasury and other public lands, through the documentation of usage rights and the payment of compensation for affected crops, trees, and structures. Do the RBP systems support livelihood restoration and support measures, including the necessary institutional provisions to ensure the effective implementation of such measures? Yes, also additional actions included in the RBP Action Plan. If not, can the RBP provide supplemental payments to meet this requirement? Does the Borrower’s system recognize the need to restore or replace public infrastructure lost because of RBP activities? If not, what mechanisms are in place to address such concerns? Yes Do land acquisition procedures include appropriate requirements for the informed participation of affected people? Does information on land acquisition and/or resettlement provide sufficient notification of the rights of those affected, including rights to timely resolution of grievances?

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	include measures in order for land acquisition and related activities to be planned and implemented with appropriate disclosure of information, consultation, and informed participation of those affected.	Yes
<p>Core Principle 6: give due consideration to the cultural appropriateness of and equitable access to RBP benefits, giving special attention to the rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.</p>	(k) Provide for identification, analysis and promotion of measures to address gender aspects (including children) and disability in RBP consultations, design and implementation processes.	<ul style="list-style-type: none"> • Do ES impact screening procedures include participation of females, children, disable persons? Yes • Do the conducted consultations on the RBP include females, children, and disable persons? Not yet. • Does the stakeholder engagement on the RBP have separated consultations with females, children, and disable groups. Not yet. • Is the RBP AP include any actions to address the identified gender aspects and the issues of children and disable persons. Yes, see Section 5.2. • Are there any gender indicators in the DLIs of the RBP? Yes, see Section 2.2.4.
	(l) Provide for meaningful consultations if Indigenous Peoples are potentially affected (positively or negatively), to determine whether there is broad community support for the RBP.	<ul style="list-style-type: none"> • Do consultations include a representative cross-section of groups affected by the RBP (including women, Indigenous People, the poor, or other groups that might be underrepresented)? N.A. • Does screening identify different property regimes, including common property resources, customary or traditional rights to land or resource use, and the rights of Indigenous Peoples? N.A. • Are issues and concerns raised during the consultations resolved and documented systematically? N.A.
	(m) Provide for participation by the Indigenous Peoples in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge.	<ul style="list-style-type: none"> • Do RBP entities regularly review and consider consultation results to obtain or broaden community support? N.A. • Does the RBP exclude activities involving: adverse impact on natural resources to which Indigenous Peoples have traditional ownership or customary use rights; resettlement from or restriction to such communities' access to such lands; or the commercial exploitation of Indigenous Peoples cultural heritage? N.A.

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	(n) Give attention to vulnerable groups and, if necessary, take special measures to promote equitable access to RBP benefits.	<ul style="list-style-type: none"> • Is there consideration of distributional equity, affordability, and cultural, racial, ethnic, or gender constraints to access or participation? Yes. • Does the incentive structure within RBP agencies promote outreach measures to encourage equitable and affordable access to Program benefits? Yes. • Does it consider how to alleviate cultural, racial, ethnic, financial, or physical barriers that hamper the participation of socially marginalized or disadvantaged groups? Yes.
Core Principle 7: avoid exacerbating social conflict.	(o) Consider conflict risks.	<ul style="list-style-type: none"> • Is the RBP being implemented in areas of recognized fragility or in post-conflict zones? No • Do the screening and design of RBP activities consider the risks of creating or exacerbating social conflict, including conflicts with ethnic or racial dimensions? N.A. • Are RBP agencies open to discussion with the Bank and consultation with stakeholders on potentially sensitive issues? N.A.